



Director of Nuclear Reactor Regulation

June 21, 1985

The enclosure to this letter provides the technical specification changes which must be resolved for certification. The SER items which require updating for certification, identified in enclosure 2 to TVA's letter of certification dated April 9, 1985, remain outstanding since an SER supplement resolving these items has yet to be issued. No additional SER inconsistencies have been identified.

Also, enclosure 3 to our letter dated April 9, 1985 identified technical specification changes which, although not required for certification, we believe would enhance and optimize the use of the technical specifications. We request that these proposed changes be evaluated and reviewed before issuance of a full-power license.

Please note that several of the technical specification changes identified in the enclosure to this letter have been incorporated into the technical specifications by NRC's May 20, 1985 transmittal of additional technical specification changes. For convenience, a note to this affect has been added to each cover page as appropriate. We are presently reviewing the May 20 transmittal and will be submitting our letter of certification in the near future.

The FSAR changes included in the enclosure to this letter will be incorporated into the next FSAR amendment (Amendment 56).

If you have any questions concerning this matter, please get in touch with D. B. Ellis at FTS 858-2681.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. A. Domer*

J. A. Domer, Chief  
Nuclear Licensing Branch

Sworn to and subscribed before me  
this 21st day of June 1985.

*Bryant M. Lowery*  
Notary Public

My Commission Expires 4/8/86  
Enclosure

cc: U. S. Nuclear Regulatory Commission (Enclosure)  
Region II  
Attn: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

ENCLOSURE

Natural Circulation Testing

By letter dated May 30, 1984 (attached), TVA requested that certain Technical Specifications requirements be waived during the performance of natural circulation testing. The waiver of these requirements must be made for TVA to be able to certify the final draft of the Watts Bar Technical Specifications.

Please note that this request was included in the letter to NRC dated April 9, 1985 (certification).

#8406040270

400 Chestnut Street Tower II

May 30, 1984

Director of Nuclear Reactor Regulation  
 Attention: Ms. E. Adensam, Chief  
 Licensing Branch No. 4  
 Division of Licensing  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of the Application of )  
 Tennessee Valley Authority ) Docket Nos. 50-390

Please refer to (1) my letter to L. S. Rubenstein dated April 9, 1980 which provided information on the Sequoyah Nuclear Plant (SQN) unit 1 low power test program as requested by Supplement No. 1 to the SQN Safety Evaluation Report (NUREG-0011), and (2) H. R. Denton's letter to H. G. Parris dated July 10, 1980, which issued Amendment No. 4 to License No. DPR-77 (SQN unit 1) concerning the subject low power test program.

TVA plans to perform one type of natural circulation test several times during the Watts Bar Nuclear Plant (WBN) unit 1 startup test program for operator training.

The applicability of the Technical Specification (TS) safety limit, figure 2.1-1 of the TS, should be waived during performance of the natural circulation tests. This figure is based on four reactor coolant pumps in operation. During performance of the tests, no reactor coolant pumps will be in operation.

During performance of the tests, the overpower and overtemperature delta-T trip functions will be considered inoperable. These trip functions obtain temperature inputs from sensors located in the resistance temperature detector bypass loops. During natural circulation, the bypass loop flow will be extremely low causing the temperature indication to be in error and the response time characteristics to be slowed. The TS requirement 2.2.1, items 7 and 8, should be waived during performance of these tests.

TVA plans to isolate the Upper Head Injection (UHI) system during performance of these tests. This will be done to prevent inadvertent actuation of the system and the potential for economic damage to the reactor internals. The UHI system provides borated water to mitigate the consequences of a large loss of coolant accident. Evaluations done for the SQN natural circulation test program established that this system provides little or no benefit for accidents involving low power or decay heat levels. TS requirement 3.5.1.2 should be waived during performance of these tests.

Director of Nuclear Reactor Regulation

May 30, 1984

Please ensure that the WBN unit 1 low power license contains the requested exemptions to the TS for the purpose of performing the natural circulation tests. By the previously referenced amendment to the SQW license, NRC granted similar exemptions that were requested by TVA.

If you have any questions concerning this matter, please get in touch with D. B. Ellis at FTS 858-2681.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*  
L. M. Mills, Manager  
Nuclear Licensing

Sworn to and subscribed before me  
this 30<sup>th</sup> day of May, 1984

*Paulette D. White*  
Notary Public  
My Commission Expires 9-5-84

cc: U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

*fk*  
RHS:DBE:LHB

cc: ARMS, 640 CST2-C  
H. L. Abercrombie, 1750 CST2-C  
J. W. Anderson, 255 SPB-K  
E. A. Belvin, 109 MPB-M  
T. G. Campbell, 1750 CST2-C  
H. N. Culver, 249A HBB-K  
G. W. Killian, 401 UBB-C (2)  
J. A. Raulston, W10C126 C-K  
H. S. Sanger, Jr., E11B33 C-K  
M. Shymlock, Watts Bar-NRC  
F. A. Szczepanski, 220 401B-C

COORDINATED: Memo from Coffey to Mills dated 5/3/84 (L33 840427 818).

Definition 1.30 "Site Boundary" and Figure 5.1-1

TVA's letter dated April 19, 1985 proposed changes to the definition of site boundary and provided a revised Figure 5.1-1.

PLEASE NOTE THAT THE SUBJECT CHANGES WERE MADE IN NRC'S MAY 20, 1985 TRANSMITTAL OF ADDITIONAL TECHNICAL SPECIFICATION CHANGES.