

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

830 Power Building

MAY 12 1978

REGULATORY DOCKET FILE COPY

Director of Nuclear Reactor Regulation  
Attention: Mr. Roger S. Boyd, Director  
Division of Project Management  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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Dear Mr. Boyd:

In the Matter of the Application of ) Docket Nos. 50-390  
Tennessee Valley Authority ) 50-391

S. A. Varga's letter to Godwin Williams, Jr., dated October 18, 1977, requested a proposal for implementation of position C3 of Revision 1 to Regulatory Guide 1.97 at the Watts Bar Nuclear Plant. S. A. Varga's letter to N. B. Hughes, dated March 7, 1978, provided additional guidance which we believe would significantly extend the scope of licensing analyses and design criteria to WASH 1400 worse-case accident conditions of very low probability.

TVA believes that a regulatory guide should not be the vehicle for a precedent setting change in the scope of design basis requirements established by the Code of Federal Regulations.

We have met with the other affected "lead plant" utilities and their associated contractors and have jointly concluded that the staff guidance in the March 1978 letter is sufficiently open ended and has such an extensive impact that generic resolution is appropriate. Consequently, TVA has joined the ad hoc committee on post accident monitoring instrumentation of the Atomic Industrial Forum, as announced in J. E. Ward's letter to Edson Case of April 17, 1978. We endorse Mr. Ward's position that a "lead plant" task force approach is inappropriate to provide resolution of any position C3 design commitments which would affect the entire industry.

The ad hoc committee has under review and will respond to the technical and implementation guidance from the Office of Nuclear Reactor Regulation and from the Office of Standards Development.

Very truly yours,



J. E. Gilleland  
Assistant Manager of Power

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Boyd  
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