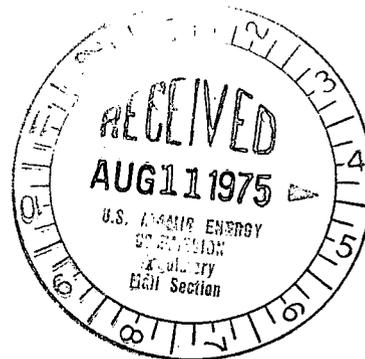


831 Power Building
TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

August 8, 1975

REGULATORY DOCKET FILE COPY



Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Rusche:

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

TVA recently solicited bids on Essential Raw Cooling Water (ERCW) pumps which would meet Quality Group "C" specifications for the Watts Bar Nuclear Plant. No responses were received to that bid invitation. A subsequent survey of six reliable pump manufacturers resulted in only three who would consider the fabrication of this type pump due to the seismic qualification requirements, the delivery requirements, and ASME Section III requirements for materials.

In order to obtain the ERCW pumps consistent with the Watts Bar construction schedule, TVA has begun negotiations with these pump vendors. Indications from the vendors contacted are that pumps meeting Quality Group "C" specifications cannot be obtained in time to prevent a significant slip in the construction schedule for the Watts Bar Nuclear Plant. One pump vendor has indicated that he could supply the ERCW pumps close to the construction schedule, but these pumps would not meet the material specification requirements for Quality Group "C" since NA-3700 is not being accepted as basis of supply by manufacturers of pump materials.

In order to avoid a lengthy construction delay at Watts Bar Nuclear Plant, TVA respectfully requests that a waiver be granted on the requirement for Quality Group "C" ERCW pumps. TVA proposes that the ERCW pumps be constructed in accordance with the following requirements:



Mr. Benard C. Rusche

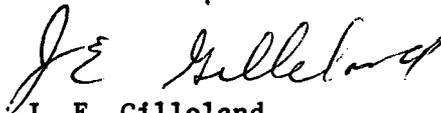
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1. Maintenance of a nuclear quality assurance program meeting the requirements of 10 CFR 50, Appendix B.
2. Seismic qualification as committed to in the PSAR.
3. Design of pump to ANSI B58.1, edition in effect at time of contract award.
4. Fabrication techniques which meet pertinent regulatory guides committed to in the PSAR with the exception of Regulatory Guide 1.26 classification requirements and the reference in Regulatory Guide 1.29 to Quality Group "C" for these pumps.
5. Qualified welding procedures and welders in accordance with ASME Section IX, and fabrication techniques to Section III Class 3 with exclusion of the current requirements for materials of NA-3700.
6. Traceability of pressure retaining materials to certified mill test reports as provided for in ASME Section III Class 3, ND-2150.

The ERCW pumps, as proposed, would not have third-party inspection or an "N" stamp, but would be subject to TVA inspection at the manufacturer's plant. TVA feels that use of pumps manufactured to these specifications would present no degradation of safety of the plant.

TVA urgently needs a waiver on the requirement for Quality Group "C" for these pumps. Your response to this request by September 1, 1975, would be appreciated so that we can proceed with negotiations for awarding a contract for the Watts Bar ERCW pumps.

Very truly yours,



J. E. Gilleland
Assistant Manager of Power