TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

December 31, 1974

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U.S. ATOMIC ENERGY COMMISSION
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Mr. Edson G. Case
Acting Director of Licensing
Office of Regulation
U.S. Atomic Energy Commission
Washington, DC 20545

Dear Mr. Case:

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

In our letter to you dated September 30, 1974, TVA requested an extension in the date for providing our evaluation of the effects of Anticipated Transients Without Scram (ATWS) for our Watts Bar Nuclear Plant from October 1, 1974, to January 1, 1975. A letter from A. Giambusso to James E. Watson dated October 25, 1974, granted the requested extension.

The Westinghouse Electric Corporation has submitted a topical report entitled "Westinghouse Anticipated Transients Without Trip Analysis" (WCAP-8330). The results of the Westinghouse analyses are within the guidelines for ATWS consequences discussed in WCAP-8330. These guidelines are based on the criteria established by the Regulatory staff's "Technical Report on Anticipated Transients Without Scram for Water-Cooled Power Reactors" (WASH-1270). In addition, Westinghouse has provided the enclosed comparison of Watts Bar design parameters with those used in the generic WCAP-8330 analyses.

TVA has reviewed the Westinghouse-prepared material. We believe that the transient analyses and sensitivity studies presented in the Westinghouse topical report envelope the significant Watts Bar design parameters. Based upon our evaluation of ATWS, TVA concludes that no design changes to the Watts Bar Nuclear Plant are required to mitigate the consequences of ATWS.

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Further, TVA believes the implementation requirements of WASH-1270 should be reconsidered for all classes of plants. The results of the draft "Reactor Safety Study" (WASH-1400), clearly show that ATWS is an event of minimal risk to the public health and safety. The probability of an ATWS occurrence is so low that awaiting the finalization of WASH-1400 would result in an extremely small incremental increase in the likelihood of an ATWS; whereas, formal implementation of the presently proposed ATWS requirement would impose a significant additional burden on the industry, a burden we believe to be unwarranted. We propose that until WASH-1400 is finalized the implementation schedule for ATWS be withdrawn and subjected to further consideration in light of the final determinations of that report.

Very truly yours,

J. E. Gilleland

J. E. Gilleland
Assistant to the Manager of Power

Enclosure