



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 11, 1993

Docket No. 50-390

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford, Vice President
Technical Support
3B Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Dr. Medford:

SUBJECT: RETENTION OF THE CONDENSATE STORAGE TANK (CST) LIMITING CONDITION FOR OPERATION (LCO) IN THE WATTS BAR TECHNICAL SPECIFICATIONS (TAC M76742)

Tennessee Valley Authority (TVA) proposed in their comments on the Watts Bar Unit 1 Proof and Review Technical Specifications (TS) dated April 30, 1993, to relocate LCO 3.7.6 "Condensate Storage Tank" from the TS to the Technical Requirements Manual (TRM). The justification for the relocation was that the Condensate Storage Tank (CST) at Watts Bar is a non-safety related structure, i.e., non-seismic Category I and non-tornado missile protected. It was also stated that the CST at Watts Bar is not credited in any accident analysis; the system credited in the safety analysis is the Emergency Raw Cooling Water (ERCW) System which is automatically aligned to the Auxiliary Feedwater (AFW) System whenever the CST is inoperable. TVA also stated that the Watts Bar design is based on the CST being the preferred water source for the AFW System and that the ERCW System is the safety-related backup source.

In a meeting at NRC headquarters on July 19 to 22, 1993, representatives from the Technical Specifications Branch (OTSB) and Plant System Branch (SPLB), discussed with TVA the proposal to relocate the LCO from the Watts Bar TS, and on a generic basis from the Standard Technical Specifications (STS). At that meeting TVA claimed that the MERITS submittal of November 12, 1987 which delineated which LCOs should be relocated from or retained in the Westinghouse STS, based the retention of the CST LCO on the premise that the CST was a safety related system, structure or component, not just a "primary success path." However, TVA and the staff did note that the CSTs at the majority of other operating plants are non-safety related structures under the requirements of TS LCO. Based on the same reasoning, TVA suggested that the CST LCO be removed generically from the STS.

The staff, however, stated that even though the majority of the plants have non-safety related CSTs, they are considered as the primary success path for the mitigation of design basis accidents. In the "NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications" dated May 9, 1988, the staff defined the "primary success path." The report stated the following:

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The phrase "primary success path," used in Criterion 3, should be interpreted to include only the primary equipment (including redundant trains/components) to mitigate accidents and transients. Primary success path does not include backup or diverse equipment or instrumentation used to prevent analyzed accidents or transients or to improve reliability of the mitigation function (e.g., rod withdrawal block which is backup to the average power range monitor high flux trip in the startup mode, safety valves which are backup to the low temperature over pressure relief valves during cold shutdown).

This definition is reflected in the Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (58 FR 39132), and is consistent with the Watts Bar design for the CST to be the preferred water source for the AFW system. The staff considers the CST as the "primary success path" even though the CST may have a safety related system as backup. Therefore, in accordance with Criterion 3, the staff concludes that the CST LCO should be retained in the Watts Bar TS and the STS. It should be noted that while the vast majority of the systems, structures and components (SSC) in LCOs are designed as safety-related, the criteria in the Commission's Policy Statement for requirements that should be controlled by TS do not exclude SSC of non-safety related design.

In conclusion, the staff considers the Watts Bar CST to be the primary success path for mitigating accidents and transients. Therefore, the CST LCO should be retained in the Watts Bar TS based on Criterion 3 of the Final Commission Policy Statement on Technical Specifications.

Sincerely,

Original signed by
Frederick J. Hebdon, Director
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

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Tennessee Valley Authority
ATTN: Dr. Mark O. Medford

cc:

Mr. W. H. Kennoy, Director
Tennessee Valley Authority
ET 12A
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Mr. D. E. Nunn, Vice President
Tennessee Valley Authority
3B Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Mr. W. J. Museler, Vice President
Watts Bar Nuclear Plant
Tennessee Valley Authority
P.O. Box 800
Spring City, Tennessee 37381

Mr. B. S. Schofield, Manager
Nuclear Licensing and Regulatory Affairs
Tennessee Valley Authority
5B Lookout Place
Chattanooga, Tennessee 37402-2801

Mr. G. L. Pannell, Site Licensing Manager
Watts Bar Nuclear Plant
Tennessee Valley Authority
P. O. Box 800
Spring City, Tennessee 37381

TVA Representative
Tennessee Valley Authority
11921 Rockville Pike
Suite 402
Rockville, Maryland 20852

Mr. Michael H. Mobley, Director
Division of Radiological Health
3rd Floor, L and C Annex
401 Church Street
Nashville, Tennessee 37243-1532

General Counsel
Tennessee Valley Authority
ET 11H
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Watts Bar Nuclear Plant

The Honorable Robert Aikman
County Executive
Rhea County Courthouse
Dayton, Tennessee 37321

The Honorable Garland Lanksford
County Executive
Meigs County Courthouse
Route 2
Decatur, Tennessee 37322

Regional Administrator
U.S.N.R.C. Region II
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Senior Resident Inspector
Watts Bar Nuclear Plant
U.S.N.R.C.
Route 2, Box 700
Spring City, Tennessee 37381

Danielle Droitsch
Energy Project
The Foundation for
Global Sustainability
P. O. Box 1101
Knoxville, Tennessee 37901

Bill Harris
Route 1, Box 26
Ten Mile, Tennessee 37880

Mr. Lee Bush
Westinghouse Owners Group
% Zion Nuclear Power Station
101 Shiloh Boulevard
Zion, Illinois 60099

Mr. Blair Wunderly
B&W Owners Group
% Crystal River Unit 3
Power Line Road
P. O. Box 219 NA2I
Crystal River, Florida 32629

Mr. Brian Woods
% Combustion Engineering Owners Group
Southern California Edison
9975 Toledo Way
Irvine, California 92718

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