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John A. Scalice
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MAY 02 1997

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of
Tennessee Valley Authority

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Docket No. 50-390

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - REVISION TO PROPOSED
LICENSE AMENDMENT - TECHNICAL SPECIFICATION CHANGE TS-96-11 -
IMPLEMENTATION OF 10 CFR 50, APPENDIX J, OPTION B, PERFORMANCE -
BASED TESTING (TAC NOS. M97698)

The purpose of this letter is to provide a revision to the proposed technical specification changes that were requested by a letter dated January 10, 1997. These revised technical specifications are the result of a teleconference with the NRC staff on April 22, 1997, and supersede those provided in Enclosure 3 of the January 10, 1997 letter. NRC requested that TVA use the latest interim technical specification guidance for the Appendix J, Option B changes. This revision is largely editorial and does not alter the intent of the previous amendment request. This submittal also provides additional discussion for the change to the technical specification bases for SR 3.6.3.8.

Enclosed is the additional information requested and the technical specification markups.

If you should have any questions, please contact P. L. Pace at (423) 365-1824.

Sincerely


J. A. Scalice

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Enclosure



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U.S. Nuclear Regulatory Commission

Page 2

MAY 02 1997

cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1
PROPOSED TECHNICAL SPECIFICATION AMENDMENT
APPENDIX J OPTION B SUPPLEMENT

As discussed in a teleconference on April 22, 1997, with NRR WBN Project Manager R. Martin, the additional justification for Technical Specification Bases SR 3.6.3.8 is provided below. In addition, the proposed changes to the technical specifications to be consistent with the interim standard for Appendix J, Option B are provided in Attachment 1. Attachment 2 provides the revised technical specification pages incorporating the proposed changes as marked up in Attachment 1.

APPENDIX J, OPTION B, JUSTIFICATION FOR B 3.6.3.8

1. The Technical Specification justifications are provided in TVA's letter to the NRC dated January 10, 1997, pages E1-8 and E1-9.
2. The Local Leak Rate Testing (LLRT) Program (Type B and C tests) at WBN consists of 191 penetrations. There are 86 penetrations subject to Type C (valve leakage) tests. These penetrations provide the major contribution to the 0.60 L_a total allowable local leakage rate. Sixty-seven of the total 86 Type C tested penetrations at WBN are defined as leakage that bypasses the emergency gas treatment system (EGTS) in the annulus and is treated by the Auxiliary Building gas treatment system (ABGTS). Since this "bypass" leakage is limited to 0.25 L_a by the technical specifications, 78 percent of the Type C penetrations tested are limited to this reduced limit rather than the 0.60 L_a limit. This reduced allowable limit for these "bypass" penetrations, coupled with the added restriction of using only maximum pathway leakage for summing the total bypass leakage at all times is unnecessarily restrictive. Using minimum pathway calculation methodology for as-found leakage summations and maximum pathway calculation methodology for as-left leakage summations is reasonable, provides consistency within the program, and does not adversely affect the design basis or alter the safety analysis related to containment integrity, including the EGTS and ABGTS systems.

ATTACHMENT 1

WATTS BAR NUCLEAR PLANT UNIT 1
PROPOSED TECHNICAL SPECIFICATION MARKUPS
APPENDIX J, OPTION B

ATTACHMENT 1
WATTS BAR NUCLEAR PLANT UNIT 1
PROPOSED TECHNICAL SPECIFICATION MARKUPS
APPENDIX J, OPTION B

The following is a list of the attached markup pages for the Operating License and Technical Specification and Technical Specification Bases:

Operating License, Page 4

3.6-2

3.6-7

3.6-14

5.0-28

Insert for Page 5.0-28

B 3.0-11

B 3.0-12

B 3.6-1

B 3.6-2

B 3.6-3

B 3.6-4

B 3.6-5

B 3.6-7

B 3.6-12

B 3.6-13

B 3.6-25

B 3.6-26

B 3.6-27