



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

DEC 23 1998

TVA-WBN-TS-97-014

10 CFR 50.90
10 CFR 50.91(a)(6)

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

Gentlemen:

In the Matter of) Docket No. 50-390
Tennessee Valley Authority)

**WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - EXIGENT LICENSE AMENDMENT
REQUEST - INLET DOOR POSITION MONITORING SYSTEM**

In accordance with the provisions of 10 CFR 50.90 and 50.91(a)(6), TVA submitted on December 22, 1998, a request for an amendment to WBN's license NPF-90 to change the Technical Requirement Manual for Unit 1 on an exigent basis to prevent a potential shutdown of the unit. That change was required due to an identified ground on an annunciator circuit that is used to confirm operability of the door position monitoring system. The proposed amendment would change the Inlet Door Position Monitoring System bases section for TSR 3.6.2.1 of the WBN Technical Requirements Manual (TRM) to modify the requirements for the shiftly channel check to account for the impact of the annunciator ground on the existing channel check methods. That request would provide relief until the next time the unit enters Mode 3.

However, plant activities have occurred subsequent to the December 22, 1998 letter resulting in a need to update that submittal. Plant personnel were able to successfully perform the channel check required by TSR 3.6.2.1 using one of the approved channel check methods.

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Technical Requirement 3.6.2 was exited on December 23, 1998. However, data obtained regarding the status of the ground has indicated that the ground could degrade to the point that the existing channel check eventually could not be performed. Without the relief in this amendment request, the TR action period would expire 14 days later. At that time, an additional 48 hours would be provided which would result in shutting down the unit in a total of 16 days from the date of the expected channel check failure. Accordingly, TVA requests that the revised TRM be approved as soon as possible.

Enclosure 1 provides a modified no significant hazards considerations superseding the one provided in the December 22, 1998 submittal which addresses the subsequent plant activities. Also, attached are Enclosures 2 and 3 providing marked up and the revised versions, respectively, of the affected TRM pages.

If you have any questions about the previously submitted change or about the revision contained in this letter, please contact me at (423) 365-1824.

Sincerely,



P. L. Pace
Site Licensing and Industry Affairs

Enclosure
cc: See page 3

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1
DOCKET NO. 50-390

PROPOSED TECHNICAL REQUIREMENTS MANUAL BASES REVISION
DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

V. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Inlet Door Position Monitoring System is defined in the bases for the TR to be the lower inlet door position display panel in the main control room. Except for its use as the channel check in TSR 3.6.2.1, the 48 switch annunciator circuit itself is not required for system operability.

TVA entered TR 3.6.2, Action Statement A for Inlet Door Position Monitoring System inoperable in Mode 1 on December 20, 1998, when the main control room (MCR) lower inlet door common annunciator (window 144A) began alarming sporadically. Annunciator Response Instruction 144-A, "Ice Condenser Inlet Door Open" corrective action is to determine which door zone is opened on the lower inlet door position display panel, 1-XI-61-187, located on panel 1-M-10 in the MCR. Although a check of this panel indicated and still indicates that all 48 doors are in the closed position, the WBN operating staff conservatively determined the Inlet Door Position Monitoring System to be inoperable since it would appear it could not pass a CHANNEL CHECK, as required by TSR 3.6.2.1. Using a TRM bases approved method, TVA was able to successfully perform the circuitry check option described in the TRM bases as a channel check and exit the TR condition on December 23, 1998. However, based on the recent performance of the annunciator circuit, TVA is concerned that the ground may be getting worse and continued reliance of the annunciator circuit may not be possible in the short term.

The proposed license amendment would temporary revise the TRM Bases for Technical Surveillance Requirement (TSR) 3.6.2.1 (Channel Check - Ice Condenser Lower Inlet Door Position Monitoring System) to provide a temporary, optional method of satisfying the requirements for the Channel Check. This method would be allowed until the next WBN plant entry into Mode 3, currently planned in late February 1999, for the U1C2 refueling outage.

TVA has concluded that operation of WBN in accordance with the proposed change to the TS does not involve a significant hazards consideration. TVA's conclusion is based on its evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

A. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The lower inlet doors have been verified to be closed by confirming the lights on the door position monitoring system panel in the control room. The annunciator circuit which is currently impacted by an identified cable ground is not in the required portion of the system. This annunciator provides no safety function. Further, the Inlet Door Position Monitoring System is not required for proper operation of the inlet doors. Therefore, by verifying the green lights are indicating and the red lights are not indicating on a 12-hour frequency provides reasonable assurance the door monitoring system is performing its required function and that the ice condenser system remains operable with no negative effects from an opened door(s). Accordingly, the change does not increase the probability or consequences of an accident previously evaluated.

B. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The ice condenser lower inlet doors and ice bed are passive features and do not have the potential of creating an accident. This change retains a reasonable method of ensuring door position is known. Accordingly, there are no mechanisms that could create an accident of a different type.

C. The proposed amendment does not involve a significant reduction in a margin of safety.

This TRM bases change provides a reasonable alternative method of ensuring the door position monitoring system is operable. The door position monitoring system itself is not assumed to actuate in any way during the course of postulated plant events. Any problems with door positions would be noted well before it could have any impact on ice bed performance. Accordingly, no Technical Specification is impacted and there is no significant reduction in a margin of safety.