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FEB 18 1994

U.S. Nuclear Regulatory Commission
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Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2 - BYPASSED AND INOPERABLE STATUS INDICATION (BISI) SYSTEM - REVISED RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI) QUESTION 2 (TAC NOS M77136 AND M77137)

This letter revises TVA's October 22, 1990 response to NRC's request for additional information (RAI) Question 2, dated August 13, 1990. Subsequent to TVA's initial response for WBN, a problem evaluation report (PER) was issued at Sequoyah Nuclear Plant on the subject issue. TVA's generic evaluation of the PER provided new information that resulted in reevaluation of the WBN BISI monitoring device list.

Based on this reevaluation, as reflected in the enclosed revised response, TVA has now excluded several components from the BISI monitoring device list that are not expected to be rendered inoperable more frequently than once a year. As a result, this revised response affects Section 2.0 of the NRC's safety evaluation on the BISI, dated March 29, 1991.

If you have any questions, contact John Vorees at (615)-365-8819.

Very truly yours,

William J. Museler

Enclosure
cc: See page 2

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ENCLOSURE

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2
REGULATORY GUIDE 1.47
BYPASSED AND INOPERABLE STATUS INDICATION (BISI)
REVISED RESPONSE TO QUESTION 2

TVA's October 22, 1990 response to Question 2 of the NRC's request for additional information (RAI) dated August 13, 1990, stated that "TVA did not exclude any components because they were not expected to be rendered inoperable more than once a year." Subsequent to TVA's initial response for WBN, a problem evaluation report (PER) was issued at Sequoyah Nuclear Plant on the subject issue. TVA's generic evaluation of the PER provided new information that resulted in reevaluation of the WBN BISI monitoring device list. The following revises the response to Question 2. This revised response affects the NRC's safety evaluation concerning BISI for WBN dated March 28, 1991.

QUESTION 2

TVA should provide a list of those Section 4.0 system components which were excluded from being monitored because they were not expected to be rendered inoperable more than once a year.

TVA REVISED RESPONSE

In accordance with Regulatory Guide 1.47, Position C.3, automatic indication should be provided in the control room for bypass of deliberately induced inoperable status that meets all three of the following conditions: a) renders inoperable any redundant portion of the protection system, systems actuated or controlled by the protection system, and auxiliary or supporting systems that must be operable for the protection system it actuates to perform their safety-related functions; b) inoperability or bypassed system is expected to occur more frequently than once per year; and c) is expected to occur when the affected system is normally required to be operable.

TVA identified components that had not been previously considered in the BISI calculation. These types of components were either directly actuated by an engineered safety feature actuation system (ESFAS) signal, indirectly actuated by an ESFAS signal or actuated by an ESFAS signal in support of a protection system. However, these components do not meet the above Regulatory Guide 1.47, Position C.3.b, because the components are not expected to be deliberately inoperable more frequently than once per year and, therefore, do not meet all three of the above guidelines. Accordingly, the types of components listed below are not required to be monitored.

1. The ventilation system engineered safety feature (ESF) equipment cooler fans and diesel generator building fans and dampers that are required to operate for one of the following conditions (depending on the particular component):
 - the initiation of Auxiliary Building isolation,
 - actuation of an associated pump, or

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- actuation of an associated diesel generator.
2. Turbine-driven auxiliary feedwater (AFW) pump flow controller and AFW steam generator level controllers.

Based on reviews of plant procedures for scheduled intervals to perform the periodic surveillance tests, inspections, maintenance, or other routine activities that would have resulted in a component being unable to operate as required, TVA concluded that these types of components would not be deliberately disabled more frequently than once a year. Therefore, these components do not meet Regulatory Guide 1.47, Position C.3.b.

The individual components excluded by the once/year frequency criteria are listed in the attachment to this enclosure.

ATTACHMENT

Components Excluded by Once/Year Frequency Criteria

Engineered Safety Features Equipment Cooler Fans

0-FAN-30-192	1-FAN-30-175	2-FAN-30-184
0-FAN-30-193	1-FAN-30-176	2-FAN-30-185
	1-FAN-30-177	2-FAN-30-194
	1-FAN-30-178	2-FAN-30-195
	1-FAN-30-179	2-FAN-30-200
	1-FAN-30-180	2-FAN-30-207
	1-FAN-30-182	
	1-FAN-30-183	
	1-FAN-30-186	
	1-FAN-30-187	
	1-FAN-30-190	
	1-FAN-30-191	
	1-FAN-30-194	
	1-FAN-30-195	
	1-FAN-30-196	
	1-FAN-30-197	
	1-FAN-30-201	
	1-FAN-30-202	
	1-FAN-30-214	

Diesel Generator Building Fans and Dampers

0-FAN-30-332	1-FAN-30-447	2-FAN-30-448
0-FCO-30-332	1-FCO-30-447	2-FCO-30-448
0-FAN-30-334	1-FAN-30-449	2-FAN-30-450
0-FCO-30-334	1-FCO-30-449	2-FCO-30-450
	1-FAN-30-451	2-FAN-30-452
	1-FCO-30-451	2-FCO-30-452
	1-FAN-30-453	2-FAN-30-454
	1-FCO-30-453	2-FCO-30-454
	1-FAN-30-491	2-FAN-30-492
	1-FAN-30-493	2-FAN-30-494

Flow and Level Controllers

1-FIC-46-57
1-LIC-3-148
1-LIC-3-156
1-LIC-3-164
1-LIC-3-171
1-LIC-3-172
1-LIC-3-173
1-LIC-3-174
1-LIC-3-175