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AUG 21 1995

U.S. Nuclear Regulatory Commission
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Washington, DC 20555

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - USE OF TEMPORARY JUMPERS FOR TESTING IN THE EAGLE-21 CABINETS

This letter clarifies the basis for WBN's exemption to Regulatory Guide (RG) 1.118, Revision 2, Position C.6.a, concerning the use of temporary jumpers for testing in the Eagle-21 process protection system cabinets. The clarification is intended to assist with the NRC staff's review of Final Safety Analysis Report (FSAR) Amendment 89.

FSAR Table 7.1-1 and Section 8.1.5.3 were revised in Amendment 89 to eliminate a possible inconsistency by more clearly defining the extent of WBN's compliance with RG 1.118, "Periodic Testing of Electric Power and Protection Systems." The wording of Section 8.1.5.3 was changed to indicate that its statement of compliance was only applicable to electrical power systems. The wording of Table 7.1-1, which applies to the Eagle-21 cabinets, was changed to note explicitly the same exception to Position C.6.a that was previously stated only in Section 8.1.5.3.

RG 1.118, Revision 2, generally endorses the requirements and recommendations of IEEE Standard 338-1977, "Criteria for the Periodic Testing of Nuclear Power Generating Station Safety Systems." Position C.6.a of the RG supplements Section 6.4(5) of IEEE Standard 338-1977 by stating: "Temporary jumper wires may be used with portable test equipment where the safety system equipment to be tested is provided with facilities specifically designed for connection of this test equipment. These facilities shall be considered part of the safety system and shall meet all the requirements of this standard, whether the portable test equipment is disconnected or remains connected to these facilities."

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WBN's exception to Position C.6.a, as stated in FSAR Table 7.1-1 and Section 8.1.5.3, is based on the following alternate approach: "Where feasible, test switches or other necessary equipment will be installed permanently to minimize the use of temporary jumpers in testing in accordance with the requirements in IEEE Standard 338-1977." This alternate approach was reviewed by the NRC staff and approved in Section 8.3.3.5.1 of NUREG-0847, "Safety Evaluation Report Related to the Operation of Watts Bar Nuclear Plant, Units 1 and 2," Supplement No. 13 (SSER 13), dated April 1994. However, this approval was limited to testing of electrical power systems and was based on TVA's commitment to "identify, by procedure, each safety system component where temporary jumpers are utilized in testing."

TVA provided the above commitment in a letter dated September 13, 1991, as part of its response to various issues concerning the description of WBN's electrical power systems in FSAR Chapter 8. The commitment stated: "To support the use of temporary jumper wires, TVA will identify each safety system component where temporary jumpers are utilized in surveillance procedures implemented periodically, and will analyze these cases (e.g., a 10 CFR 50.59-type of analysis) to demonstrate that the jumper will not compromise the design basis of the system or component being tested."

The applicability of the above commitment may not be clear since it was made in the context of a letter dealing with electrical power systems. As the result of several telephone calls between TVA personnel and Mr. Eric Lee of the NRC staff, TVA is submitting this letter to confirm that the above commitment applies to periodic surveillance testing in the Eagle-21 process protection system cabinets as well as testing of electrical power systems. Therefore, the basis for TVA's exception to RG 1.118, Revision 2, Position C.6.a, in FSAR Table 7.1-1 is exactly the same as the basis for the exception in FSAR Section 8.1.5.3.

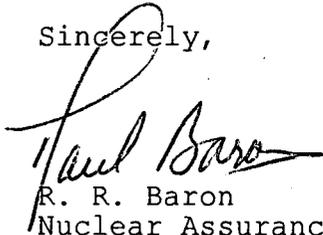
The periodic surveillance tests in the Eagle-21 cabinets that require the use of temporary jumpers include resistance temperature detector (RTD) response time testing and RTD cross-calibration. TVA has contacted other plants with Eagle-21 equipment and determined that they use similar testing methods which require the use of temporary jumpers.

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If you have any questions about the information provided in this letter, please telephone John Vorees at (615) 365-8819.

Sincerely,



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