



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001
March 1, 1999

Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

SUBJECT: WATTS BAR NUCLEAR PLANT - CHANGE TO POWER OPERATED RELIEF VALVE SURVEILLANCE TESTING COMMITMENT (TAC NO. MA4457)

Dear Mr. Scalice:

By letter dated December 22, 1998, the Tennessee Valley Authority (TVA) informed the Nuclear Regulatory Commission (NRC) staff of a change to a commitment made for the Watts Bar Nuclear Plant in response to Generic Letter (GL) 90-06, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve [power operated relief valve] and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10 CFR 50.54(f)." The original commitment stated, in part, that "PORVs will be stroke time tested in Mode 3 or 4 when proceeding from power to a condition where the PORVs are relied upon by the cold overpressure mitigation system (COMS)." TVA stated that the commitment is being revised to indicate that the the PORVs will be "operated through one complete cycle of full travel at least once per 18 months in Modes 3, 4 or 5 with a steam bubble in the pressurizer." TVA also stated that the revised commitment is consistent with the intent of GL 90-06.

The revised commitment removes the requirement to test the PORVs each time the plant is shut down. The recommendations in the GL were not intended to have the PORVs tested each time the reactor was shut down, and as a result, removing the requirement is not a safety concern. Additionally, the new commitment permits testing the valve in Mode 5 with a steam bubble in the pressurizer. This is desirable because it preserves the intent to test the valve hot, or in a condition similar to when it may be operating at power. However, permitting testing in Mode 5 with a steam bubble in the pressurizer allows PORV testing when the PORV is required for COMS operation. The staff's view is that this is not consistent with the intent of the GL which recommends testing prior to entering the region where the COMS system is required. However, TVA has indicated that work is frequently performed on the PORVs during the outage and that post-maintenance testing of the valve while going up in temperature is required. The Watts Bar COMS includes three ways of providing overpressure protection. Two separate overpressure protection paths are required by the plant Technical Specifications (TS), with limited time permitted in a condition where only one overpressure protection relief path is available. The limited time, permitted by the plant TS, was intended to allow for necessary plant maintenance and testing. Additionally, the staff considers it unlikely that testing the PORV, in Mode 5 with a bubble in the pressurizer, will cause an overpressure event that requires

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J. Scalice

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overpressure protection. As a result, the staff does not believe that the revised commitment creates a safety concern.

The revised commitment in TVA's letter of December 22, 1998 does not represent a licensing action that requires prior NRC staff review and, accordingly, the NRC staff has not prepared a formal safety evaluation addressing this matter. However, the NRC staff considers TVA's actions in informing the staff of the revisions to the commitment to be a proactive approach in TVA's management of Watts Bar commitments and has chosen to provide the above comments on the revision to the PORV commitment.

Sincerely,

Original signed by:

Robert E. Martin, Senior Project Manager
Project Directorate II-3
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-390

cc: See next page

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Sincerely,



Robert E. Martin, Senior Project Manager
Project Directorate II-3
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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