



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

August 9, 1994

Docket Nos. 50-390  
and 50-391

MEMORANDUM FOR: Docket File

FROM: Peter S. Tam, Senior Project Manager  
Project Directorate II-4  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

SUBJECT: WATTS BAR NUCLEAR PLANT - MATERIAL TO BE USED IN UPCOMING  
CONFERENCE CALL ON FSAR AMENDMENT 84 (TAC M88937 AND M88938)

The attached two pages of comments were faxed to TVA today to prepare its site personnel for an upcoming conference call. The comments do not constitute a formal request for additional information.

A handwritten signature in cursive script that reads "Peter S. Tam".

Peter S. Tam, Senior Project Manager  
Project Directorate II-4  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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NRC Staff Comments on

Watts Bar FSAR Amendment 84, Chapter 14

July 14th Letter

Page 14.2-17 of Amendment 84: Par. 4.A.(1)(e), this paragraph appears to be in conflict with Table 14.2-1 (RG 1.97 instrumentation exception). TVA personnel agreed that this was an oversight [This would supposedly be addressed in Ament. 88].

Change Pckg. 1068 - Exception to have PASS sampling analyzed within required timespan in FSAR Section 9.3.2.6. This was NOT identified in SSER 12 (Amendment 74) as an open or unresolved item. [Nor was it discussed during the July 6th meeting at TVA].

Change Pckg. 1073 - TVA's changes appear to be limiting the scope of the requisite testing to just safety-related valves. This is not in agreement with RG 1.68 nor with TVA's test abstract stated "Purpose". [Supposedly being addressed in Ament. 88 - TVA personnel agreed to restore original language].

Change Pckgs. 1089 and 1089 Supps. 1 and 2 - Note that an explanation will be needed for any portion that is being revised, modified or deleted. Also, like we told TVA in the meeting, we do expect to see "Acceptance Criteria" in all test abstracts. [Supposedly being addressed in Ament. 88]

Change Pckg. 1097 - Appendix J requirements. This change will require concurrence from other NRC technical branches; it affects Chapter 6 of the FSAR.

July 20th Letter (Regarding PTIs to ATIs)

We have done a look back at the preoperational test programs for the most recently licensed plants in Region II. We note that most plants seemed to closely follow the guidance in Regulatory Guide 1.68 and performed the preop tests that TVA wants to relocate from PTI to ATI. In any event, the 7/14/94 and 7/20/94 submittals do not contain complete details for the staff to evaluate the conversions. Per several telecons with TVA, the missing details may be found in FSAR Amendment 88, to be submitted 8/15/94 (?):

It appears that the letter claims that "programmatically" PTIs and ATIs are identical except that the JTG does not review ATIs. Is this a valid conclusion? Heard from TVA in telecons: "Not necessarily"

Enclosure 3, Item 7: Is this a typo? Heard from TVA in telecons: "It appears to be"

Fire Protection Test Abstract in Enclosure 2: Since this change only affects the CO2 portion of the system, the acceptability of the text that will remain in the PTI portion (not addressed in letter) would need review and approval, i.e., in Amendment 88.

We were under the impression that the text of the 11 test abstracts to be "relocated" from PTI to ATI would be unchanged from their Amendment 74 version (as approved under SSER 12). This is not the case.

Intake Pump Station Ventilation - In Amendment 48, TVA committed to include a preoperational test abstract on this system (reference SSER 3). Therefore, TVA may have to provide additional justification for their determination of low safety significance for the system. TVA personnel has stated that the intake pumping station vent system is not safety-related, nor is it needed to support the operation of safety-related equipment. Can TVA technically support that contention on the docket?

Deleting testing for the portions of the ice condenser refrigeration equipment. For ice loading, we suggest that TVA treat that as a PTI and accomplish it with a plant Surveillance Instruction as allowed by their own current procedures. Their procedures allow them to accomplish PTIs by 'alternate methods' such as using a normal SI that goes through the normal PTI review process prior to use.

Liquid Waste Drain Collection and Transfer system. Drains for areas not containing safety-related equipment or potentially radioactive liquids need not be included in the PTI. The test summary should be modified to reflect this method and retained in the FSAR.

The Process Computer System is very important to safe operation of the plant. The staff is of the opinion that the testing of the computer should be retained in the FSAR and completed as a PTI.