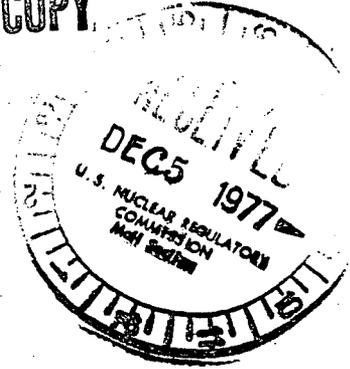


830 Power Building

TENNESSEE VALLEY AUTHORITY  
CHATTANOOGA, TENNESSEE 37401

REGULATORY DOCKET FILE COPY

December 2, 1977



Mr. Roger S. Boyd, Director  
Division of Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Boyd:

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

S. A. Varga's letter to Godwin Williams, Jr., dated October 18, 1977, requested a proposal for implementation of Position C3 of Revision 1 to Regulatory Guide 1.97 at the Watts Bar Nuclear Plant. We agree with the statement in Mr. Varga's letter that the guide does not provide detailed guidance. As a result of our discussions with the NRC Task Force reviewers, we are concerned that implementation of this guide could lead to design basis requirements beyond the requirements of 10 CFR 50 and 10 CFR 100.

TVA has met with other affected applicants (Commonwealth Edison Company, Houston Lighting and Power Company, and San Diego Gas & Electric Company); and we have agreed that there is a need for a joint meeting with you to obtain further guidance and to discuss our concerns. If it is convenient for you, we would appreciate meeting during the week beginning December 5, 1977.

Very truly yours,

J. E. Gilleland  
Assistant Manager of Power

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