

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

February 19, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

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

Enclosed are proposed revisions to the Watts Bar unit 1 draft Technical Specifications which have resulted from recent meetings and conference calls.

Specifically enclosed are: (1) revisions to technical specification 3.6.1.8 (Emergency Gas Treatment System) addressing annulus pressure limits, (2) revisions to technical specification 4.8.1.1.2.f.8 (Diesel Generator Loads) changing the reference to continuous rating rather than 2000 hour rating, and (3) withdrawal of requested revisions to technical specification 4.1.2.3.2, and 4.5.3.2 concerning additional methods to demonstrate pump inoperability.

If you have any questions concerning this matter, please get in touch with D. B. Ellis at FTS 858-2681.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. H. Shell

R. H. Shell
Nuclear Engineer

Sworn to and subscribed before me
this 19th day of Feb. 1985.

Paulette H. White
Notary Public

My Commission Expires 8-24-88

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Mr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1

DRAFT TECHNICAL SPECIFICATIONS
PROPOSED REVISIONS

TVA has reviewed the changes proposed by NRC in recent meetings and conference calls and finds the need for the limiting condition for operation acceptable at this time. However, the correct reference locations for the pressure measurement is the mechanical equipment room. Also, a footnote is needed to exempt the pressure requirement during VENTING operation, required annulus entries, and auxiliary building isolations. Annulus pressure cannot be maintained during these conditions. The duration of the out-of-limit conditions is short. The footnote will eliminate the generation of many unnecessary licensee event reports. Venting occurs three times a day on the average. The total vent time per day is typically less than 2 hours and usually less than 1 hour. This operation alone would result in 1000 licensee event reports per year.

The need to enter the annulus is for inspection or repair of equipment. The time annulus integrity is not maintained, is limited to entry and exit transit time. This time is measured in terms of minutes per transit. On occasion, an auxiliary building isolation may occur as a result of equipment problems or electrical noise in the isolation actuation circuitry. The normal annulus vacuum fans are isolated from the annulus on this signal. The duration of auxiliary building isolations is short (measured in terms of minutes) under these conditions.

Also, as discussed in a recent conference call, TVA does not object to the incorporation of a time limitation on the applicability of the proposed footnote.

CONTAINMENT SYSTEMS

EMERGENCY GAS TREATMENT SYSTEM

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LIMITING CONDITION FOR OPERATION

3.6.1.8 Two independent Emergency Gas Treatment System (EGTS) trains shall be OPERABLE and the annulus pressure shall be ≤ -5.0 inches water gauge with respect to the mechanical equipment room.*
APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one EGTS train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the annulus pressure > -5.0 inches water gauge with respect to the mechanical equipment room, restore the annulus pressure to within SURVEILLANCE REQUIREMENTS the limit within 8 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

4.6.1.8.1 Each EGTS train shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS, by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating;
- b. At least once per 18 months, or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system, by:
 - 1) Verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 4000 cfm \pm 10%;
 - 2) Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 0.2%; and

* The limit on annulus pressure is not applicable during VENTING operations, required annulus entries, or during an auxiliary building isolations.

CONTAINMENT SYSTEMS

EMERGENCY GAS TREATMENT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

LIMITING CONDITION FOR OPERATION

- 3) Verifying a system flow rate of 4000 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978, for a methyl iodide penetration of less than 0.2%.
- d. At least once per 18 months, by:
 - 1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches Water Gauge while operating the system at a flow rate of 4000 cfm \pm 10%.
 - 2) Verifying that the system starts automatically on a Phase "A" Isolation test signal.
 - 3) Verifying that the filter cooling bypass valves can be opened.
 - 4) Verifying that the air cleanup subsystem maintains the annulus building at a pressure equal to or more negative than minus 0.5 inches Water Gauge relative to the Shutdown Board Room with an inleakage of less than or equal to 100 cfm, and
 - 5) Verifying that the heaters dissipate 20 \pm 2.0 kW when tested in accordance with ANSI N510-1975.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1975 for a DOP test aerosol while operating the system at a flow rate of 4000 cfm \pm 10%; and
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1975 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 4000 cfm \pm 10%.

4.6.1.8.2 The annulus pressure shall be verified to be ≤ -5.0 inches water gauge at least once per 24 hours.
 ↑ with respect to the mechanical equipment room.

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The 2000 hour rating should be changed to the continuous rating. The correct value for the continuous rating is 4400 kw. The 2000 hour rating is provided by the manufacturer as a duration limit for a certain load. At Watts Bar, the generator is limited to 2000 hours of operation at 4840 kw. This is the 2000 hour rating. TVA recommends that the continuous rating be used in the technical specifications. If NRC is not willing to change from the standard format which lists the 2000 hour rating, then the value should be corrected to 4840 kw.

FINAL DRAFT

SURVEILLANCE REQUIREMENTS (Continued)

The 2000 hour rating should be changed to ~~2000~~ ⁴⁴⁰⁰ kw. The 2000 hour rating is provided by the manufacturer as a ~~continuous~~ ^{intermittent} rating. At 4400 kw, the ~~these limits during this test.~~ Within 5 minutes after completing this 24-hour test, perform Specification 4.8.1.1.2d.6)b);*

- 8) Verifying that the auto-connected loads to each diesel generator do not exceed the ~~2000 hour~~ ^{continuous} rating of 4400 kW;
- 9) Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
- 10) Verifying that the automatic load sequence timers are OPERABLE and their Setpoints are within the specified bands; and
- 11) Verifying that the following diesel generator lockout features prevent diesel generator starting only when required:
 - a) Engine overspeed, or
 - b) 86 GA lockout relay, or
 - c) Emergency stop.
9. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting all diesel generators simultaneously, during shutdown, and verifying that all diesel generators accelerate to 900 ± 18 rpm in less than or equal to 10 seconds; and

*If Specification 4.8.1.1.2d.6)b) is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at 4400 kW for 1 hour or until operating temperature has stabilized.

TECHNICAL SPECIFICATION 4.1.2.3.2 (PAGE 3/4 1-9) AND 4.5.3.2 (PAGE 3/4 5-10)

By letter dated September 14, 1984, TVA submitted proposed modifications to the Watts Bar unit 1 draft Technical Specifications. Included in this submittal was a request to revise technical specifications 4.1.2.3.2 and 4.5.3.2 to allow the demonstration of pump inoperability by verifying that the pumps are in the pull-to-lock position and/or that the motor circuit breakers are tagged out.

NRC partially incorporated TVA's proposed revision into the final draft version of the Technical Specifications; however, instead of specifying "and/or" (allowing either method of demonstrating inoperability), the technical specifications specified "and" (requiring both methods).

In a recent conference call, NRC standard technical specification reviewer indicated that he would not approve TVA's request allowing either method of demonstrating inoperability. Therefore, TVA wishes to withdraw the requested revision allowing the demonstration of pump inoperability by verifying the pumps are in the pull-to-lock position as submitted by letter dated September 14, 1984.