

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
1630 Chestnut Street Tower II

March 24, 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

During a February 6, 1985 meeting held to discuss various issues regarding the Watts Bar draft technical specifications, NRC representatives indicated that Watts Bar technical specification 3.6.1.8, "Emergency Gas Treatment System," should be revised to incorporate requirements for annulus pressure limitations.

By letter dated February 15, 1985 NRC forwarded revisions to the final draft version of the Watts Bar unit 1 Technical Specifications which were previously transmitted by letter dated December 11, 1984. Included in this transmittal was revised technical specification 3.6.1.8. The Limiting Condition for Operation was revised to include a requirement that the annulus pressure be less than or equal to -5 inches water gauge with respect to the Mechanical Equipment Room. An accompanying Action Statement was added to require that with the annulus pressure more positive than minus inches water gauge that the pressure must be restored to its limit within eight hours or that the plant be placed in at least Hot Standby within six hours and in Cold Shutdown within the following 30 hours.

By letter dated February 19, 1985 TVA submitted proposed revisions to technical specification 3.6.1.8 which corresponded to the revisions made by NRC, except for the incorporation of a footnote which exempted the pressure limit requirements during venting operations, required annulus entries, and Auxiliary Building isolations.

TVA stated that the exemption from the pressure requirements during these events was needed since annulus pressure could not be maintained during these conditions. In addition, TVA addressed that the exemption was also needed to eliminate the generation of many unnecessary licensee event reports (LERs), as there would need to be an LER generated for each event. TVA noted that venting occurs three times a day on the average and that the total vent time is typically less than two hours and usually less than one hour.

Upon review of TVA's proposed technical specification changes NRC representatives indicated that from a technical point of view, they agreed on the necessity for relief from the pressure requirements during venting operations, etc., but that an exemption to the LCO is not an appropriate method to obtain such relief. NRC indicated that TVA would need to specifically request an exemption from the reporting requirements of 10 CFR 50.73.

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Boo!
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Director of Nuclear Reactor Regulation

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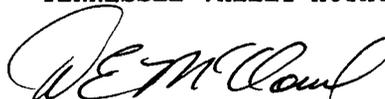
Accordingly, with respect to the annulus pressure requirements of technical specification 3.6.1.8, we request pursuant to 10 CFR 50.73(f) than an exemption be granted from the reporting requirements of 10 CFR 50.73 during venting operations, required annulus entries and Auxiliary Building isolations not exceeding one hour in duration.

Enclosed is the corresponding proposed technical specification change.

If you have any questions concerning this matter, please get in touch with D. B. Ellis of my staff at FTS 858-2682 in Chattanooga.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



D. E. McCloud
Nuclear Engineer

Sworn to and subscribed before me
this 24th day of March 1985

Paulette W. White

Notary Public

My Commission Expires 8-24-88

Enclosure

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

Enclosure