TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
5N 157B Lookout Place

January 28, 1986

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Project Director
PWR Project Directorate No. 4
Division of Pressurized Water Reactor (PWR)
Licensing A
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

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

An ongoing review of Watts Bar Nuclear Plant (WBN) Surveillance Instructions has resulted in the identification of the enclosed draft Technical Specification (TS) Revisions.

The revisions involve exclusion of monthly and quarterly setpoint verification during trip actuating device operational tests for Engineered Safety Feature Actuation and reactor trip, respectively. Setpoint verification requires that the relays be removed from service for extended periods of time and, thereby, jeopardize electrical equipment protection for that period of time. This would introduce the possibility of violating TS requirements in section 3.8.1.1 (page 3/4.8-1) resulting in an increased probability of forced unit shutdown. It would also seem to violate our commitment regarding our response to Nuclear Regulatory Commission (NRC) question 40.10 on the WBN Final Safety Analysis Report (FSAR) to avoid bypassing safety functions when possible. Each unnecessary maintenance and testing action also introduces a greater chance for personnel maintenance error and spurious safety actuations.

The above reasoning, coupled with the fact that these setpoints are verified during channel calibration tests performed every 18 months and the subject devices are reliable components, constitutes Watts Bar justification for the draft TS revision.

Please note that the schedule for the trip actuating device operational tests will be maintained as stated in the draft TS. The extent of the suggested TS revision is to delete the requirements for setpoint verification during each trip actuating device operational test and rely on the channel calibration tests performed every 18 months for setpoint verification.

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Since implementation of the present setpoint verification would jeopardize electrical equipment protection, the setpoint verification schedule change should be reflected in the TS before TS certification.

If there are any questions, please get in touch with K. P. Parr at FTS 858-2681.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. L. Gridley
Manager of Licensing

Sworn to and subscribed before me
this 28th day of Jan. 1986

Paulette H. White
Notary Public
My Commission Expires 8-24-88

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

TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
13. Reactor Coolant Flow - Low - Two Loops	S	R	Q(13)	N.A.	N.A.	1
14. Steam Generator Water Level-Low-Low	S	R	Q(13)(14)	N.A.	N.A.	1, 2(14)
15. Steam Generator Water Level - Low Coincident with Steam/Feedwater Flow Mismatch	S	R	Q(13)	N.A.	N.A.	1, 2
16. Undervoltage - Reactor Coolant Pumps	N.A.	R	N.A.	Q(13)(15)	N.A.	1
17. Underfrequency - Reactor Coolant Pumps	N.A.	R	N.A.	Q(13)(15)	N.A.	1
18. Turbine Trip						
a. Low Fluid Oil Pressure	N.A.	R	N.A.	S/U(1, 10)	N.A.	1
b. Turbine Stop Valve Closure	N.A.	R	N.A.	S/U(1, 10)	N.A.	1
19. Safety Injection Input from ESF	N.A.	N.A.	N.A.	R	N.A.	1, 2
20. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	N.A.	R(4)	S/U(1)	N.A.	N.A.	2##
b. Low Power Reactor Trips Block, P-7	N.A.	R(4)	S/U(1)	N.A.	N.A.	1
c. Power Range Neutron Flux, P-8	N.A.	R(4)	S/U(1)	N.A.	N.A.	1

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TABLE 4.3-1 (Continued)

TABLE NOTATIONS

*Only if the Reactor Trip System breakers happen to be closed and the Control Rod Drive System is capable of rod withdrawal.

##Below P-6 (Intermediate Range Neutron Flux Interlock) Setpoint.

###Below P-10 (Low Setpoint Power Range Neutron Flux Interlock) Setpoint.

(1) If not performed in previous 31 days.

(2) Comparison of calorimetric to excore power indication above 15% of RATED THERMAL POWER. Adjust excore channel gains consistent with calorimetric power if absolute difference is greater than 2%. The provisions of Specification 4.0.4 are not applicable to entry into MODE 2 or 1.

(3) Single point comparison of incore to excore axial flux difference above 15% of RATED THERMAL POWER. Recalibrate if the absolute difference is greater than or equal to 3%. The provisions of Specification 4.0.4 are not applicable for entry into MODE 2 or 1.

(4) Neutron detectors may be excluded from CHANNEL CALIBRATION.

(5) Detector plateau curves shall be obtained, evaluated and compared to manufacturer's data. For the Intermediate Range and Power Range Neutron Flux channels the provisions of Specification 4.0.4 are not applicable for entry into MODE 2 or 1.

(6) Incore - Excore Calibration, above 75% of RATED THERMAL POWER. The provisions of Specification 4.0.4 are not applicable for entry into MODE 2 or 1.

(7) Each train shall be tested at least every 62 days on a STAGGERED TEST BASIS.

(8) Not Used.

(9) Quarterly surveillance in MODES 3*, 4* and 5* shall also include verification that permissives P-6 and P-10 are in their required state for existing plant conditions by observation of the permissive annunciator window. Quarterly surveillance shall include verification of the Boron Dilution Alarm Setpoint of less than or equal to one-half decade above background.

(10) Setpoint verification is not required.

(11) The TRIP ACTUATING DEVICE OPERATIONAL TEST shall include independent verification of the Undervoltage and Shunt trips.

(12) CHANNEL CALIBRATION shall include the RTD bypass loops flow rate.

(13) Each channel shall be tested at least every 92 days on a STAGGERED TEST BASIS.

(14) The surveillance frequency and/or required Modes specified for these channels in Table 4.3-2 are more conservative and, therefore, controlling.

(15) Quarterly operational test does not require verification of relay setpoints.

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	MASTER RELAY TEST	SLAVE RELAY TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
6. Auxiliary Feedwater (Continued)								
d. Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.							
e. Loss-of-Offsite Power	N.A.	R	N.A.	M (2)(5)	N.A.	N.A.	N.A.	1, 2, 3
f. Trip of All Main Feedwater Pumps	N.A.	N.A.	N.A	R	N.A.	N.A.	N.A.	1, 2
g. Auxiliary Feedwater Suction Pressure-Low	N.A.	R	N.A.	M (2)	N.A.	N.A.	N.A.	1, 2, 3
7. Automatic Switchover to Containment Sump								
a. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3, 4
b. RWST Level - Low Coincident With Containment Sump Level - High	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
And Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.							
8. 6.9 kV Shutdown Board								
a. Loss of Voltage	N.A.	R	N.A.	M (3) (5)	N.A.	N.A.	N.A.	1, 2, 3, 4
b. Degraded Voltage	N.A.	R	N.A.	M (3) (5)	N.A.	N.A.	N.A.	1, 2, 3, 4

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TABLE 4.3-2 (Continued)

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TABLE NOTATION

(1) Each train shall be tested at least every 62 days on a STAGGERED TEST BASIS.

(2) Monthly testing shall consist of relay testing excluding final actuation of the pumps or valves.

(3) Monthly testing shall consist of voltage sensor relay testing excluding actuation of the load shedding, diesel start, and time-delay timers.

(4) Slave relays K603A, K603B, K604A, K604B (SI) and K625A, K625B (Phase B isolation) shall be tested during each cold shutdown exceeding 24 hours unless tested during the previous 92 days. K609A, K609B (SI) shall be tested every 18 months.

(5) Monthly operational test does not require verification of relay setpoints.