

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

JUL 31 1990

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2 - HEAT CODE TRACEABILITY -  
PROPOSED FINAL SAFETY ANALYSIS REPORT (FSAR) SECTION 3.2.2.5

This letter provides proposed updates to FSAR Section 3.2.2.5 concerning the  
Heat Code Traceability program at WBN.

By letter dated June 26, 1990, TVA submitted Amendment 63 to the WBN FSAR. As  
stated in that letter, Chapter 3 was not addressed because a Civil Program  
Review Team is reviewing the civil programs at WBN. However, FSAR Section  
3.2.2.5 is not affected by those pending reviews. The enclosure provides an  
advance copy of the proposed updates to that section in order that the current  
information concerning the Heat Code Traceability program at WBN is available  
for your review. These proposed revisions will be submitted in a subsequent  
FSAR amendment.

If there are any questions concerning this matter, please contact  
R. J. Stevens at (615) 365-8650.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



E. G. Wallace, Manager  
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Regulatory Affairs

Enclosure  
cc: See page 2

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JUL 31 1990

U.S. Nuclear Regulatory Commission

cc (Enclosure):

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ENCLOSURE

PROPOSED FINAL SAFETY ANALYSIS  
REPORT (FSAR) SECTION 3.2.2.5 REVISIONS

sections of the Safety Analysis Report where the systems are discussed in detail.

The Code of Record of Section III of the ASME Code applied to systems within TVA's scope is the 1971 Edition with Addenda through Summer 1973. The use of later Edition and Addenda, as permitted by paragraph NA-1140 of the ASME Code and by 10 CFR 50.55a, is controlled to ensure the following:

- a. Later Edition and Addenda used has been accepted by the NRC through incorporation by reference in 10 CFR 50.55a (b) (i).
- b. Related requirements necessary to support use of later Edition and Addenda are implemented in accordance with NA 1140.
- c. Code Cases used have been accepted by the NRC through incorporation by reference in either Regulatory Guide 1.84 or Regulatory Guide 1.85.
- d. Additional requirements added by either Regulatory Guide 1.84 or Regulatory Guide 1.85 are implemented.

The Code of Record for components ordered by TVA is determined in accordance with 10 CFR 50.55a, footnote 5. Material ordered by TVA and supplied with certification to a later Edition and Addenda is controlled by a comparison of the Edition and Addenda to which it is certified to the Code of Record applicable to the application in which it is used. All deviations from the applicable Code of Record are reconciled prior to use of the material.

Material procured prior to the initiation of the Acceptable Suppliers List (ASL) program (approximately May 1978) has been addressed through an NRC approved alternative to the ASME Code paragraph NA-3451(a), Reference [1].  
Material

- procured as ASTM material,
- installed or to be installed in an ASME system,
- whose proof of survey or qualification by TVA of the manufacturer's quality assurance program at the time of procurement cannot be retrieved, and
- whose material specification is identical to the requirements of ASME Section II as stated by the ASME material specification,

is acceptable for use assuming all other attributes of the material and the documentation conform to ASME code requirements.

#### 3.2.2.6 Nonnuclear Safety Class (NNS)

Components that are used in Seismic Category I structures whose failure would not result in a release of radioactive products and are not required to function during an accident or malfunction within the reactor coolant pressure boundary have been assigned TVA Classifications G or K. Since these components complement components having a primary safety function during normal operation and may be in close proximity to them, they are seismically qualified to the extent necessary to prevent an unacceptable influence on Safety Class equipment during a seismic event. Thus the minimum capability

of primary system components will not be compromised by the failure of a Class G or K component during a seismic event. Components not requiring any seismic qualification are assigned to TVA Class H, J, or L. The applicable codes, along with the seismic classifications used for the design of the components covered by these classifications, are shown in Table 3.2-5.

### 3.2.2.7 Heating, Ventilation and Air Conditioning (HVAC) Safety Classification

Those portions of the HVAC Systems which are safety related have been assigned TVA classifications and have been designed to Seismic Category I and I(L) specifications as applicable. All equipment, components, ductwork, etc., in the August, 1970, Draft N18.2-1970 Safety Classes 1, 2a, 2b and 3 perform primary safety functions and are designed to Seismic Category I. Portions of systems not performing a safety function may need a degree of seismic qualification because their failure could produce an unacceptable influence on the performance of safety functions. These are designed to Seismic Category I(L). The applicable codes along with the seismic qualifications used for the design of the HVAC components are shown in Table 3.2-6 .

#### REFERENCES

1. Letter from B. D. Liaw of NRC to O. D. Kingsley of TVA dated March 15, 1990 "NRC Inspection Report Nos. 50-390/90-02 and 50-391/90-02".