

Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381

William J. Museler Site Vice President Watts Bar Nuclear Plant

### JUL 27 1992

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) - SAFETY EVALUATION REPORT (SER) - PROPOSED LICENSE CONDITION (LC) 28 AND LC 29, NUREG-0737, ITEMS I.C.7 AND I.C.8 (TAC NO. M77861)

This letter provides information related to actions being taken at WBN to close proposed LCs 28 and 29, as documented in Section 13.5.2 of the WBN SER dated June 1982.

# LC 28 - Review of Power Ascension Test Procedures and Emergency Operating Instructions (EOIs) by NSSS Vendor (I.C.7)

This letter updates TVA's letter to NRC dated July 27, 1984, stating that the Westinghouse review of the WBN power ascension tests and emergency procedures had been completed and that comments and appropriate revisions would be incorporated before Unit 1 startup. This is due to extended delays in startup of WBN Unit 1 and the numerous changes to plant equipment and procedure generation and approval processes that have occurred. Current information related to the issues of LC 28 is as follows:

As noted in the above referenced letter, the WBN power ascension tests have been previously reviewed by Westinghouse. Currently, the power ascension tests are being updated and enhanced and will undergo a review by a subcommittee of the Plant Operations Review Committee (PORC) prior to final approval. This subcommittee consists of selected qualified plant supervisory and technical personnel who will review the initial power ascension test procedures, revisions, and test results.

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Vendor review will be accomplished through a Westinghouse representative being assigned to this review group. Plant Administrative Instruction (PAI)-7.02 is being issued and contains provisions for Westinghouse participation on this review committee. The vendor support by Westinghouse Electric Corporation for power ascension testing is also addressed in Section 14.2.2.4.3 of the Final Safety Analysis Report (FSAR).

The vendor review of EOIs is no longer appropriate since WBN has revised its EOIs to conform to the Westinghouse Owners Group (WOG) Emergency Response Guidelines (ERGs), except for plant-specific deviations, in accordance with TVA's standardized EOI development program described below. NRC Inspection Report 50-390/85-08 and 50-391/85-08 dated March 29, 1985, confirmed that WBN EOIs conform to the WOG guidelines and closed NUREG-0737, Item I.C.7. In addition, contract arrangements are being made for vendor participation by Westinghouse during the verification and validation phase of the EOI development.

#### LC 29 - Modifications to EOIs (I.C.8)

Subsequent to the pilot monitoring of selected EOIs for WBN, several developments have occurred that improve the implementation of the EOI program. This effort no longer depends upon identifying differences between Sequoyah Nuclear Plant (SQN) and WBN.

The WBN simulator has been completed and is certified, refer to TVA's letter to NRC dated March 7, 1991, to train operations personnel. The procedure validation process utilizes the WBN simulator. Therefore, the SQN versus WBN differences are no longer a factor in the validation process.

WBN has produced draft EOIs that conform to WOG ERGs, Revision 1-A, which have been approved by the NRC staff. WBN's Site Standard Practice (SSP)-12.16, "Emergency Operating Instruction (EOI) Control," and the Writer's Guide for Abnormal and Emergency Operating Instructions comprise the current Procedure Generation Package (PGP). SSP-12.16 implements TVA Corporate Standard (STD)-12.16, "Emergency Operating Instruction Control." This standard formulates a standardized procedure development process for the TVA nuclear plants and derives from the various NUREGs published for this purpose.

In summary, issuance of PAI-7.02 will ensure that the NUREG-0737 Item I.C.7 requirement for vendor review of the power ascension tests is accomplished. The remaining item in I.C.7 concerning vendor review of the EOIs is no longer applicable due to adherence to the WOG ERGs.

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Proposed LC 29 required conformity of WBN's EOIs to those at SQN, with plant-specific differences being identified. Due to the many design basis and equipment differences between these plants and the availability of a WBN simulator, WBN is developing the EOIs as "stand-alone" documents to comply with TVA's STD-12.16. TVA, therefore, considers LC 29 to be no longer applicable.

The issues described in this letter were discussed by teleconference on June 30, 1992, with Peter Tam and Jesse Arlidsen of the NRC staff. If you have questions concerning this matter, please telephone John Vorees at (615) 365-8819.

Sincerely,

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