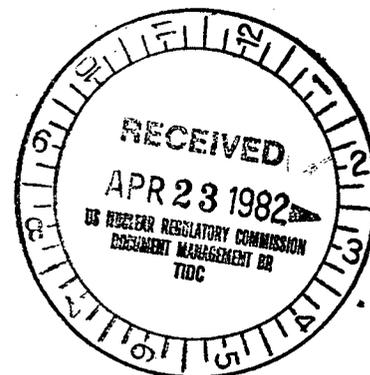


TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

April 21, 1982



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

Dear Ms. Adensam:

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

On March 30, 1982 TVA received an informal request from the NRC for additional information on the initial test program at Watts Bar Nuclear Plant. Enclosed are TVA's positions with respect to Watts Bar compliance to NRC Regulatory Guide (RG) 1.68 Revision 2. TVA's response with respect to RGs 1.20 Revision 2, 1.52 Revision 2, and 1.79 Revision 1 will be provided by June 4, 1982.

If you have any questions concerning this matter, please get in touch with D. P. Ormsby at FTS 858-2682.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Sworn to and subscribed before me  
this 21st day of April 1982

Paulette H. White

Notary Public

My Commission Expires 9-5-84

Enclosure

cc: U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
INITIAL TEST PROGRAM

Question:

The staff has requested that the following systems be included in the Initial Test Program:

- (1) Condensate system.
- (2) Leakage tests of ECCS systems and testing of leak detection and pumping systems provided to control leakage from ECCS systems.
- (3) Ventilation systems for the intake pumping station.
- (4) Turbine building area ventilation system.
- (5) Raw cooling water system.
- (6) Hotwell level control system.
- (7) Condensate storage tank auxiliaries including systems used for temperature control of tanks and suction lines and indication and alarm functions.
- (8) 48 VDC system.
- (9) Failed fuel detection system.
- (10) Chemical addition systems for the secondary plant.
- (11) Turbine gland sealing system and gland seal water system.
- (12) Standby lighting system.
- (13) Condenser Circulating Water.

TVA has stated these tests are not required by Regulatory Guide 1.68, Rev. 0. TVA will apparently test some of these systems during the preoperational test program, but is reluctant to provide NRC with documented test abstracts of these tests. The staff requests TVA to re-examine the above list of tests and either provide NRC with test abstracts or show that these systems:

- a. Will not be used for shutdown and cooldown of the reactor under normal plant conditions and for maintaining the reactor in a safe condition for an extended shutdown period.
- b. Will not be used for shutdown and cooldown of the reactor under transient (infrequent or moderately frequent events) conditions and postulated accident conditions and for maintaining the reactor in a safe condition for an extended shutdown period following such conditions.
- c. Will not be used for establishing conformance with safety limits or limiting conditions for operation that will be included in the facility technical specifications.

- d. Are not classified as engineered safety features and will not be relied on to support or ensure the operations of engineered safety features within design limits.
- e. Are not assumed to function and for which credit is not taken in the accident analysis of the facility, as described in the FSAR, and
- f. Will not be used to process, store, control, or limit the release of radioactive materials.

Response:

The standby lighting system is included under the Emergency Lighting System in test TVA-36. TVA does not consider the other listed systems to be safety-related systems and therefore does not include them in the Initial Test Program. However, to ensure that these systems are functional, they are included in TVA's Non-Critical Systems Test Program.