

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

May 20, 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. TVA's positions with respect to Watts Bar compliance to NRC Regulatory Guide (RG) 1.68 Revision 2 were provided by my letter to you dated April 21, 1982. TVA has reevaluated its test program, and enclosed is a revised response providing the list of tests applicable to the systems specified.

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
L. M. Mills, Manager
Nuclear Licensing

Sworn to and subscribed before me
this 20th day of May 1982

Bryant M. Lowery
Notary Public
My Commission Expires 4/8/86

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.
- f. Will not be used to process, store, control, or limit the release of radioactive materials.

Response

The following systems are included in the TVA preoperational test program.

<u>System</u>	<u>Test</u>
(12)	TVA-36
(2)	TVA-44B
(3)	TVA-69
(9)	TVA-28

The remaining systems are not considered to be safety related but are included in TVA's Non-Critical Systems Test Program (NCS) to ensure that the systems are functional except for the following.

- a. The heat trace system for condensate storage tank auxiliaries
- b. 48 VDC System

These two systems are included in the TVA construction tests following installation to ensure functionability.