

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

November 29, 1982

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

Dear Ms. Adensam:

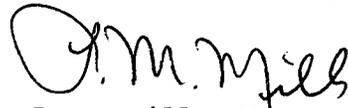
In the Matter of the Application of ) Docket Nos. 50-390  
Tennessee Valley Authority ) 50-391

The Watts Bar Nuclear Plant Safety Evaluation Report (SER) states that the NRC staff will require that the auxiliary systems for the diesel generator units ". . . be designed to ASME Section III, Class 3 (Quality Group C) requirements and conform to the guidelines of Regulatory Guide 1.26." Enclosed is TVA's response to this position which is designated as SER open item 13.

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 Licensing

Sworn to and subscribed before me  
this 29th day of Nov. 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

3001

ENCLOSURE  
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
QUALITY CLASSIFICATION OF DIESEL GENERATOR  
AUXILIARY SYSTEM PIPING AND COMPONENTS

The NRC staff has required that the auxiliary systems for the diesel generator units at Watts Bar Nuclear Plant (WBN) "be designed to ASME Section III, Class 3 (Quality Group C) requirements and conform to the guidelines of Regulatory Guide 1.26." This requirement as imposed by the NRC staff exceeds any regulatory guidance in effect at the time the construction permit for WBN was docketed (5/71) or at the time TVA let the procurement specification for the diesel generator units (2/74). Regulatory Guide 1.26 - Revision 0 (3/72), in effect at the time of procurement, did not state that the design of the diesel generator systems must comply with ASME Section III, Class 3 requirements. The auxiliary systems for the diesel generator units at WBN were designed to seismic Category 1 and ANSI B31.1 (Quality Group D) requirements. This was consistent with standard nuclear industry practice and regulatory guidance at that time.

Regulatory Guide 1.26 - Revision 1 (9/74), which postdates both the construction permit docket and the procurement specification, provided the first regulatory guidance that specifically stated that the design of diesel generator systems must comply with ASME Section III, Class 3 (Quality Group C) requirements. However, the regulatory guide further stated that "quality group classifications and standards described in Section C of this guide may be applied, at the designers option, to systems and components of plants for which the docket date of the application is before January 1, 1975." Regulatory Guide 1.26 - Revision 2 (6/75) revised this verbage to state "that if an applicant wishes to use this regulatory guide in developing submittals for applications docketed on or before January 1, 1975, the pertinent portions of the application will be evaluated on the basis of this guide." Neither Revision 1 or Revision 2 of Regulatory Guide 1.26 required that the design of the diesel generator system for applications docketed before January 1, 1975, comply with the requirements stated therein.

Regulatory Guide 1.26 - Revision 3 (2/76) provided the verbage on which the NRC staff position is presently based. It stated "that the method described herein is being and will continue to be used in the evaluation of submittals for operating license or construction permit applications until the guide is revised."

As previously stated, the requirement as imposed by the NRC staff exceeds any regulatory guidance in effect at the time the application was docketed. The present design is in compliance with Regulatory Guide 1.26 - Revision 0, in effect at the docket date and is consistent with standard nuclear industry practice at the docket date. The NRC requirement that TVA must comply to a revision of a regulatory guide that postdates the design of the diesel generator system by some two years is not justified. The implementation of the action required by the NRC staff to comply with this position would require expenditure of approximately four million dollars

and result in a significant delay in the scheduled fuel load date. A comparison of Regulatory Guide 1.26 requirements against the design requirements specified by ANSI B31.1 and TVA's quality assurance program for design, construction, and installation of the auxiliary systems for the diesel generator units failed to demonstrate an increase in plant safety margin which would warrant such modification. TVA cannot justify implementation of the stated NRC requirement and as such does not intend to execute any redesign of its existing auxiliary systems for the diesel generator units at WBN.