TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

June 29, 1983

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

During a telephone conference call on May 27, 1983, TVA and the NRC discussed TVA's response to NUREG-0737 item II.F.2," Instrumentation for Detection of Inadequate Core Cooling for Watts Bar Nuclear Plant." At that time we were informed of an NRC proposal with respect to early implementation of the Reactor Vessel Level Instrument System (RVLIS). The following information on this subject, including Generic Letters 82-28 and 82-33, is provided to reaffirm TVA's position concerning a RVLIS implementation schedule.

Generic Letter 82-28 states that (1) licensees who have completed installation of an approved generic ICC system are authorized to make their system operable before final NRC approval for purposes of operator training and familiarization, (2) ICC instrumentation should not be turned on until the licensee has completed the task analysis portion of the control room design review, and (3) ICC instrumentation should be used with prudence in relation to any operator actions or decisions until the plant-specific design and installation have been approved by the staff, and instructions on its use and operation have been incorporated in accordance with the emergency operating procedure guidelines into approved emergency operating procedures (EOPs).

Supplement 1 to NUREG-0737 has been issued and allows utilities to establish realistic plant-specific schedules for performance of the control room design review and implementation of upgraded EOPs. Use of RVLIS in plant-specific EOPs is a function of the control room design review task analysis and approved EOPs. TVA has adopted an integrated approach to satisfy the requirements of supplement 1 to NUREG-0737, and the use of RVLIS in EOPs is necessarily one facet of that integrated approach. It is not the intent of the supplement nor is it TVA's intention to single out RVLIS for a nonintegrated implementation. As such, RVLIS will be installed before fuel load, and it will be used for operator training and familiarization only. Upgraded EOPs, which will include guidance on the use of RVLIS, and the task analysis portion of the control room design review will be performed in accordance with the schedule in our April 15, 1983 response to Supplement 1 to NUREG-0737.

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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 June 1983

Paulette D. White
Notary Public
My Commission Expires 9-5-84

cc: U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303