

# TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

October 28, 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

Please refer to my letter to you dated September 14, 1981 which transmitted our initial response to NUREG-0737.

NUREG-0737, item II.K.3.17 required licensees to submit a detailed report containing outage data for the previous 5 years of operation for emergency core cooling (ECC) equipment. This report was to include: (1) outage dates and duration, (2) cause of the outage, (3) ECC systems and components involved, and (4) corrective actions taken. Applicants for an operating license were required to establish and submit for NRC review a plan for implementing the above reporting requirements. By the referenced letter, TVA committed to develop and submit to NRC before fuel load a plan for satisfying the NUREG requirements. This commitment is identified in the Safety Evaluation Report (SER) as License Condition 30.

At the time this requirement was imposed, it appeared to be the only way that the NRC could obtain reliable data on equipment performance and availability. The NRC was apparently dissatisfied with the quality of information available from the then existing Licensee Event Reports (LERs) and the Nuclear Plant Reliability Data System (NPRDS). Participation in the NPRDS was voluntary, and LERs did not contain detailed information about equipment problems. During this timeframe, NRC proposed a combined LER and NPRDS program. This concept has now evolved into the new 10 CFR 50.73 rule (issued on July 26, 1983 via Federal Register notice 48 FR 33850-33859) on LERs plus a more or less required participation in the NPRDS. All of the information requested by the subject NUREG item will be contained in the NPRDS data base at the Institute of Nuclear Power Operations. In addition, any serious problem with ECC systems will be reported to the NRC by the new LER program and will contain a detailed review and evaluation of the outage.

TVA believes that active participation in the NPRDS program and compliance with the requirements of the new 10 CFR 50.73 rule satisfies the requirements of NUREG-0737 item II.K.3.17, and makes redundant the development of a separate TVA program to obtain ECC systems' outage data. In light of the recent developments mentioned above, we request that our previous commitment be disregarded. Please review this matter at the earliest date possible so that we may proceed accordingly.

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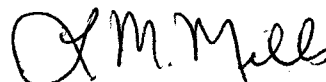
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If you have any questions concerning this matter, please get in touch with D. B. Ellis at FTS 858-2682.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Licensing

Sworn to and subscribed before me  
this 28<sup>th</sup> day of Oct 1983



Notary Public

My Commission Expires 4/8/86

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