

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

March 28, 1984

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)

As requested by NRC representatives during previous discussions, we are formally transmitting proposed modifications to the TVA radiological environmental monitoring program described in the Watts Bar Nuclear Plant unit 1 draft Appendix A Technical Specifications. These proposals have previously been discussed with NRC representatives. Enclosed are the subject TVA proposals and corresponding supporting basis for each request.

If you have any questions concerning this matter, please get in touch with D. B. Ellis at FTS 858-2681.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Licensing

Sworn to and subscribed before me
this 28th day of March 1984

Charlette H. White
Notary Public
My Commission Expires 9-5-84

Enclosure

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

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ENCLOSURE
WATTS BAR NUCLEAR PLANT

JUSTIFICATIONS FOR MODIFICATIONS
TO TECHNICAL SPECIFICATION 6.9.1.6

Specification 6.9.1.6, page 6-20--The proposal to change the submittal date for the Annual Radiological Environmental Operating Report from May 1 to May 31 of each year is based on the existent requirement to submit two other reports (annual reports for the Browns Ferry and Sequoyah facilities) by May 1 of each year. All sample analyses are usually completed by mid-March of each year; however, a significant amount of time is required to complete construction of the computerized data base, evaluate, and verify the data in each report. By delaying the submittal date for the Watts Bar Nuclear Plant annual report, a more thorough evaluation can be performed on the data set for each report.

Specification 6.9.1.6, page 6-20--The requirement to include results of all radiological environmental samples and measurements is inconsistent with reporting requirements for TVA's other operating nuclear power plants. Inclusion of analytical results of all samples is time consuming in terms of compilation, printing, distribution, and review of a bulky, several-hundred page report. The extra time involved in the preparation of a report of this magnitude would make it much more difficult to complete and submit by the scheduled May 31 due date. Since all data is closely examined during the analytical phase and during the interpretive/comparison phase; and in order to standardize TVA's reporting procedures, we propose that the first sentence of paragraph three of this specification be revised to read as follows:

The Annual Radiological Environmental Operating Reports shall include the summarized and tabulated results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the report period pursuant to the locations specified in the table and figures in the Offsite Dose Calculation Manual, in the format of the table in the Radiological Assessment Branch Position, Revision 1, November 1979.