

FEB 28 1984

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Tennessee Valley Authority
ATTN: Mr. H. G. Parris
Manager of Power
500A Chestnut Street Tower II
Chattanooga, TN 37401

Gentlemen:

SUBJECT: PREOPERATIONAL TESTING OF WATTS BAR INSTRUMENT AIR SYSTEMS, DOCKET
NO. 50-390

REFERENCES: (a) Letter from R. C. Lewis to H. G. Parris dated October 12, 1983
(b) Letter from R. C. Lewis to H. G. Parris dated November 16, 1983
(c) Letter from L. M. Mills to James P. O'Reilly dated
September 22, 1983
(d) Letter from L. M. Mills to James P. O'Reilly dated October 24,
1983

The NRC committed to perform an evaluation (References (a) and (b)) to determine if testing being performed by TVA (References (c) and (d)) fully meets the intent of Regulatory Guide 1.80, Preoperational Testing of Instrument Air Systems, and thus satisfies TVA's commitment in the Watts Bar FSAR (Section 9.3.1.4) to meet the Regulatory Guide. The specific concern is whether the gradual loss of instrument air test may be performed on individual valves, one at a time, in lieu of simultaneously on as many valves of the system as possible. The NRC evaluation has been completed and since adequate technical justification for not performing the gradual loss of air test as described in position C.9 of Regulatory Guide 1.80 has not been provided by TVA, the gradual loss of air test should be performed simultaneously on as many valves of the system as possible.

The objective of a gradual loss of air test performed simultaneously on all components is to reveal systems interaction. To provide a meaningful complement of operating systems, this test ideally should be performed during integrated hot functional testing of systems prior to fuel loading.

In addition, NRC agrees with TVA regarding the performance of the sudden loss of air test. Such a test is not practicable due to limitations inherent in the Watts Bar system design.

In conclusion, the Notice of Deviation (Reference (a)) and the additional example to the Notice of Violation (Reference (b)) remain as written. Additionally, supplemental responses are requested within 30 days after receipt of this letter for References (c) and (d) to address the questions contained in the letter to the Notice of Deviation and the questions contained in the Notice of Violation, respectively.

MP

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We appreciate your cooperation in this matter.

Sincerely,

R. C. Lewis, Director
Division of Project and
Resident Programs

- cc: J. A. Coffey, Director of Nuclear Power
- W. T. Cottle, Plant Superintendent
- G. Wadewitz, Project Manager
- R. M. Pierce, OEDC Project Manager
- J. W. Anderson, Manager
Office of Quality Assurance
- H. N. Culver, Chief, Nuclear Safety
Review Staff
- D. L. Williams, Jr., Supervisor,
Licensing Section
- R. E. Teamer, Project Engineer

- bcc: NRC Resident Inspector
Document Management Room
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