

# TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

July 27, 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	)	50-391

Please refer to TVA's letters dated September 15, 1982, July 27, 1983 and June 19, 1984 which transmitted various comments/proposed modifications to the Watts Bar Nuclear Plant (WBN) unit 1 draft Appendix A Technical Specifications (Tech Spec).

Included in each of the referenced transmittals was a request to increase the allowable Reactor Coolant System (RCS) isolation valve leakage from the current draft Tech Spec limitation of 1 gpm to the more appropriate plant specific design value of 9 gpm. TVA provided justification on a plant specific basis supporting this request in response to FSAR Question 112.38 (Amendment 46).

Since submittal of the referenced letters, several meetings and conference calls have been held to discuss TVA's comments/proposed modifications to the draft WBN Tech Specs. Although the 1 gpm versus 9 gpm issue has been the subject of such discussion, resolution has yet to be achieved. NRC representatives have repeatedly informed TVA that this issue is under generic review and that until such time that a generic resolution is realized, the WBN Tech Specs would be developed with the 1 gpm leakage criteria.

TVA believes that it has presented adequate documentation describing the conservatism of the WBN design in this area to warrant resolution outside the scope of the generic review. TVA further maintains that issuing the WBN unit 1 Tech Specs with the 1 gpm leakage criteria imposes a requirement that is overly restrictive which could result in unnecessary forced plant shutdowns. We, therefore, request that a meeting be established as soon as practical to discuss this matter outside the realm of the generic review.

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Director of Nuclear Reactor Regulation

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D. B. Ellis of my staff will get in touch with T. J. Kenyon to arrange a meeting to discuss this issue.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*

L. M. Mills, Manager  
Nuclear Licensing

Sworn to and subscribed before me  
this 27<sup>th</sup> day of July 1984

*Paulette H. White*

Notary Public

My Commission Expires 9-5-84

cc: U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323