

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

February 13, 1985

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)
Tennessee Valley Authority

Docket Nos. 50-390
50-391

Please refer to your January 14, 1985 letter to H. G. Parris requesting additional information concerning Watts Bar Nuclear Plant (WBN) Safety Evaluation Report (SER) Open Items 13 and 14 regarding diesel generators and License Condition 21 regarding testing of the communication systems at WBN. This letter constitutes our response to your request concerning License Condition 21.

During a January 15, 1985 conference call, NRC representatives indicated the basis for the preoperational testing of the communication systems is contained in Regulatory Guide (RG) 1.68 which recommends that for communication tests:

"Tests should include demonstrations of the proper operation of evacuation and other alarms, the public address system within the plant, systems that may be used if the plant is required to be shutdown from outside the control room, and communication systems required by the facility emergency plan."

In that conference call, NRC indicated that the sound powered telephone system and one additional system should be tested. During a subsequent conference call held on January 30, 1985, NRC stated that all communication systems would require testing.

In amendment 53 of the FSAR, TVA committed to perform preoperational tests on the emergency sound power telephone system and the paging system. TVA considers the emergency sound power and paging systems adequate to perform effective communications should it be necessary for the plant to be shutdown from outside the main control room and radio and telephone communications are not available. The equipment for the sound power telephone system has primary and secondary lines between stations to provide redundant capabilities for communications.

Shutdown from outside the control room was performed during hot functional preoperational testing in accordance with Administrative Operating Instruction (AOI)-27 "Main Control Room Inaccessibility" and a walk-through of AOI-27 was performed during an NRC 10 CFR 50 Appendix R Inspection. Actions were taken to correct problems identified on the communication systems. During the performance of Startup Test SU-6.3 "Shutdown from Outside the Control Room,"

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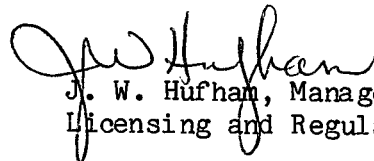
communications will again be established and demonstrated between the remote shutdown locations. In addition, communication systems required by the facility emergency plan are tested once per year during the emergency drill.

Consequently, TVA believes that the required communication systems are adequately demonstrated and tested and that further preoperational testing of the communication systems is not necessary for compliance with RG 1.68. Should the NRC Staff decide to maintain its position regarding preoperational testing of the communication systems, we request a meeting at the appropriate management levels be arranged at the earliest date possible to resolve this issue.


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

Very truly yours,

TENNESSEE VALLEY AUTHORITY


J. W. Hufham, Manager
Licensing and Regulations

Sworn to and subscribed before me
this 13th day of Feb 1985.


Notary Public

My Commission Expires 8-24-88

cc: U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323