

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

March 14, 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

During the NRC inspection of Watts Bar Nuclear Plant on February 18-22, 1985, the NRR reviewer rejected TVA's use of administrative controls and manual operations to ensure that fire dampers close without airflow during a fire event. The reviewer suggested the use of an automatic fan shutdown for this purpose. This position was confirmed in a telecon between Tom Kenyon of your staff and K. Mali of mine on February 26, 1985. Additionally, the NRC Staff restated their rejection of TVA's position in a meeting with TVA on March 7, 1985 in Bethesda, Maryland.

TVA's design is based on closure of fire dampers without airflow, and we have tested these dampers to verify proper operation. TVA uses manual operations to stop airflow when needed, based on the assessment and direction of an assistant shift engineer who is a licensed operator trained in the operation of plant ventilation systems during fire situations. The NRC Staff's rejection of this method for closing fire dampers would severely reduce the fire control options available to the fire brigade. This lack of control affects the ability of the brigade leader to make informed decisions on deployment of personnel and equipment used for firefighting. This lack of brigade discretion could result in a weakened fire response, lifesafety hazards to building inhabitants, and unnecessary plant shutdowns.

Therefore, TVA disagrees with the staff position on this matter and we propose a meeting with the staff on March 26, 1985 to present the justification for our position.

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Director of Nuclear Reactor Regulation

March 14, 1985

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

*R. H. Shell*

R. H. Shell  
Nuclear Engineer

Sworn to and subscribed before me  
this 14<sup>th</sup> day of Mar. 1985.

*Paulette W. White*  
\_\_\_\_\_  
Notary Public

My Commission Expires 8-24-88

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