

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

1630 Chestnut Street Tower II

March 24, 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) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

By letter dated February 19, 1985, concerning the effects of a postulated main steam line break (MSLB) in the valve vault room (VVR) at Watts Bar Nuclear Plant (WBN) related to electrical equipment environmental qualification, TVA indicated that final resolution of this item will be provided before initial criticality. In a subsequent telephone conference call with NRC representatives on March 14, 1985, the staff requested that TVA provide a commitment to resolve this issue before exceeding the 5-percent power level. In that conference call they also requested that TVA provide operating times for equipment in the VVR which must operate to mitigate the accident, as well as clarification regarding the use of the environmental qualification (EQ) report in the preventive maintenance (PM) program. Below is TVA's response to these concerns.

Concerning resolution of the environmental qualification issues relating to MSLB in the VVR, TVA is currently awaiting plant-specific calculations being performed by Westinghouse Electric Corporation. These calculations will provide mass and energy release rates and protection system operating times for these events. We expect to have the Westinghouse calculation reviewed and approved, TVA calculations of VVR temperature response and operating times for equipment in the vaults completed to show acceptability of the TVA position on this matter, and the overall results transmitted to NRC by June 14, 1985. This supersedes our previous commitment to resolve this issue by initial criticality as transmitted to NRC in R. H. Shell's letter to E. Adensam dated February 19, 1985.

TVA has already provided to NRC an engineering evaluation of the effects of this postulated event on the equipment located in the VVR and an analysis that considers thermal blankets installed to provide additional protection to instrumentation (including cabling) designated for postaccident monitoring. We believe that these previous submittals on this issue provide adequate justification for plant operation pending final resolution of this issue. Our position is also supported by the results of other utilities' probability risk assessments (PRAs) which indicate that MSLB is not a significant contributor to risk.

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TVA's "Qualification Maintenance Data Sheet" (QMDS) manual, rather than the EQ report, controls preventive maintenance requirements regarding equipment subject to 10 CFR 50.49. The QMDS manual is a quality-assured document which summarizes design and maintenance information needed to maintain equipment qualification. The maintenance information includes the qualified lifespans for each device and its limiting internal components, plus specific qualification maintenance requirements that were identified by the qualification test program conducted for that device. These maintenance specifications are mandatory inputs into the PM schedules and procedures for WBN.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY



D. E. McCloud,
Nuclear Engineer

Sworn to and subscribed before me
this 24th day of March, 1985

Paulette H. 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

RHS:KM:MLM

cc: NUC PR ARMS, 1520 CST2-C	J. A. Raulston, W10C126 C-K
J. W. Anderson, 255 SPB-K	H. S. Sanger, Jr., E11B33 C-K
W. T. Cottle, Watts Bar	M. B. Shymlock, Watts Bar-NRC
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