

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
1630 Chestnut Street Tower II

March 23, 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 22, 1985, TVA submitted a response to concerns expressed by item 4 of Section 3.10.1 of Supplement 3 of the Watts Bar Nuclear Plant (WBN) Safety Evaluation Report (SSER 3). On March 14 and 22, 1985, in followup discussions with NRC representatives, TVA agreed to provide three examples of our preventive maintenance (PM) procedures in order to resolve this concern.

TVA has concluded that this concern should be evaluated based on our earlier submittal in conjunction with the following explanation:

NRC's concern appears to be based on the following statement as delineated by item 4 of Section 3.10.1 of WBN SSER 3 (emphasis added by TVA):

To ensure that safety-related equipment is seismic resistant throughout the plant life, a detailed program of surveillance and maintenance should be provided for staff review and approval.

TVA believes that the PM program described in our submittal dated February 22, 1985, is fully adequate to satisfy regulatory requirements (including operational considerations implied in General Design Criterion 2 and industry standards such as ANSI N18.7-1976.)

The following significant considerations are already a part of TVA's operational program for WBN:

- a. The design/procurement process obtains qualified equipment. The designer verifies from vendor-supplied data that equipment is indeed qualified for its specified use.
- b. The designer specifies seismic installation instructions on applicable design drawings. Drawing specifications must be adhered to in installation and maintenance of equipment.
- c. Maintenance, preventive maintenance, procurement, and modification activities are controlled to ensure that qualified equipment is maintained or replaced to maintain or surpass the same standards and conditions as originally applied.

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- d. Past industry experience has been incorporated into the PM program in accordance with vendor recommendations, which are based on service and test experience. These recommendations should provide for the timely correction of aging components.
- e. Much of the plant's equipment is subject to considerable shakedown during operation, such that review of performance and failure data will aid in the identification of excessive deterioration. Industry experience from other plants and industry sources will supplement site experience.

Note: As aging susceptibility of seismically qualified devices such as relays, motors, transformers, and other electrical devices is identified, TVA expects that notices and circulars, vendor bulletins and manual changes, operating experience reports, or equivalent means will be issued in a timely manner to permit upgrading of preventive maintenance measures at nuclear plants.

The objective of TVA's basic surveillance and maintenance program is to maintain the equipment as nearly as possible to its originally qualified state throughout its qualified life. The specific objective of the program is the maintenance of equipment operation reliability. This is accomplished through an extensive program of adherence to equipment manufacturers' instructions, applicable industry codes and standards, and NRC directives by IE bulletins and information notices. While the program is not specifically directed toward seismic concerns, the program to maintain equipment operability would inherently tend to uncover and correct the type of equipment degradation which would be of concern relative to its seismic resistance.

In conclusion, TVA believes that the operating program for WBN satisfies the stated concern based on information supplied in our previous submittal, as amplified herein, and is representative of the programs in place at other utilities.

In order to facilitate the conclusion of this issue, we are enclosing copies of the four PM procedures listed below. These procedures have been marked to highlight actions relevant to concerns expressed by the NRC.

<u>Procedure</u>	<u>Subject</u>
SI-8.21	Vital Battery-Battery Inspection and Charger Test
SI-8.23	Diesel Generator Battery Inspection and Charger Test
MI-57.1	Annual 6900V Switchgear Inspection
MI-82.8	Diesel-Generator 18-Month Electrical Inspection

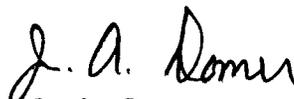
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If you have any questions concerning this matter, please get in touch with K. D. Mali of my staff at FTS 858-2682 in Chattanooga.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



J. A. Domer,
Nuclear Engineer

Sworn to and subscribed before me
this 23rd day of March 1985



Notary Public

My Commission Expires 8-24-88

Enclosure

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