

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

October 11, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

This is in reference to our efforts at Watts Bar Nuclear Plant (WBN) to meet the requirements of 10 CFR 50.62, paragraphs (C)(1) through (C)(5), regarding the reduction of risk from Anticipated Transients Without Scram (ATWS) events for light-water-cooled nuclear power plants. Paragraphs (C)(3), (C)(4), and (C)(5) apply only to boiling water reactors and paragraph (C)(2) does not apply to Westinghouse reactors. Therefore, only the requirements of paragraph (C)(1) apply to our efforts at WBN.

We will install ATWS mitigating system actuation circuitry (AMSAC) at WBN based on a generic functional design developed by the Westinghouse Owners Group (WOG). Westinghouse Technical Bulletin WCAP-10858 describes the three alternative generic designs and was submitted to NRC for review and approval on July 25, 1985 by letter from L. D. Butterfield to Dr. C. O. Thomas. We had received preliminary indications, through WOG, that NRC intended to issue a safety evaluation report (SER) on the generic designs by the end of September 1985. That would have allowed each licensee two weeks to review the SER before informing the Office of Nuclear Reactor Regulation how and when each plant will comply with the ATWS rule. It is now our understanding that the SER will not be issued until at least mid-November of this year.

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We are currently evaluating design options 1 and 2 (actuation on low steam generator water levels and actuation on low main feedwater flow) of WCAP-10858 to determine the most economical design for WBN. Our schedule for implementation of the AMSAC system at WBN is: (1) prior to startup following the unit 1, cycle 1 refueling outage, and (2) prior to initial fuel loading on unit 2. The unit 1 schedule does not meet the schedule requirements specified in 10 CFR 50.62(d). This is justified by the fact that design, procurement, and construction lead times do not allow implementation before startup of unit 1, currently scheduled in early 1986.

It should be noted that our schedules for implementation of the ATWS rule at WBN are contingent upon implementing a design based on WCAP-10858. We believe it prudent not to proceed with detailed design and procurement activities for WBN until NRC has issued an SER on WCAP-10858. If our review of the issued SER indicates that changes to our schedule will be necessary, we will notify NRC within 60 days of its issuance.

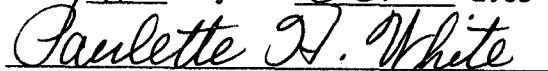
Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. H. Shell
Nuclear Engineer

Sworn to and subscribed before me
this 11th day of Oct, 1985



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

Mr. T. J. Kenyon
Watts Bar Project Manager
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