

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

# JUL 10 1991

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

#### Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2 - INTERIM SAFETY EVALUATION OF FINAL SAFETY ANALYSIS REPORT (FSAR) SECTION 14.2 - NRC QUESTIONS 413.04 AND 413.24 (TAC NOS 63651 AND 77061)

This letter provides confirmation of TVA's responses to the concerns discussed in an April 22, 1991 conference call and NRC's interim safety evaluation on the subject items dated June 6, 1991.

The following provides TVA's response as discussed in the referenced conference call:

#### NRC Concern to Question 413.04

TVA initially committed to conduct this test on both units. Amendment 54 modified the test program to delete the commitment to conduct this test on Unit 2. A letter from D. E. McCloud (TVA) to E. Adensam dated March 27, 1985, noted that this item dealt with Unit 2 and would be addressed at a later date. The NRC subsequently issued SSER 5 (dated November 1990) that closed all remaining items through Amendment 55 (subject to confirmation by subsequent FSAR Amendment) for Unit 1 only. This item remains open as it applies only to Unit 2.

Therefore, the applicant should either reinstate Startup Test (SU)-6.2 (Loss of Offsite Power) in FSAR Table 14.2-2B (Unit 2 Startup Tests), or provide technical justification for not performing this test on Unit 2.

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#### TVA Response:

During the conference call, it was stated that TVA intended to reinstate the Loss of Offsite Power Test for Unit 2 and that Figure 14.2-3 and Table 14.2-2B of the WBN FSAR would be revised to add SU-6.2 to the Unit 2 Initial Test Program. Figure 14.2-3 was revised by Amendment 65 to include SU-6.2 for both Units 1 and 2. FSAR Table 14.2-2B will be revised in a future amendment to include SU-6.2, Loss of Offsite Power.

### NRC Concern to Question 413.24

TVA initially committed to acceptance criteria regarding a minimum air flow rate of 28,000 cfm for the Reactor Building Purge System Test. This value was in agreement with the design specification stated in FSAR Subsection 9.4.6.2 regarding required air flow rates. Amendment 54 modified the test program to decrease the acceptance criteria to 22,949 cfm. The March 15, 1985 letter stated that this was an open item. A letter from D. E. McCloud (TVA) to E. Adensam dated March 27, 1985, stated:

"TVA's design organization had evaluated the reduced flow rate of 22,949 cfm and found them acceptable (Ref. PT 110). This flow rate can effectively purge the containment. The acceptance criteria has thus been changed to reflect 22,949 cfm."

Therefore, the applicant should either modify FSAR Table 14.2-1, TVA-9B (Reactor Building Purge System) to reinstate the acceptance criteria for minimum air flow rate in accordance with FSAR Subsection 9.4.6.2 (28,000 cfm), or modify Subsection 9.4.6.2 and provide technical justification for the revised air flow rate (22,949 cfm) acceptance criteria.

#### TVA Response:

During the conference call, TVA stated that as a result of the preoperational testing of the Reactor Building Purge System, it was discovered that the air blowers were operating in a higher pressure environment than was originally anticipated, and because of that factor, the air blowers were unable to achieve the 28,000 cfm flow rate. TVA is in the process of downgrading portions of the Reactor Building Purge System to a non-engineered-safety-feature because the containment atmosphere cleanup and the air flow rate functions are not required to mitigate the results of a design basis event. Therefore, the extra time necessary to purge the Reactor Building at the lower flow rate would not impact the WBN FSAR Chapter 15 accident analysis.

TVA will ensure that the FSAR Sections 9.4.6.2, 6.5.1.2.3, Tables 6.5-5 and 14.2-1, TVA-9B, and appropriate design basis documents are revised to be consistent.

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The enclosure provides a list of commitments identified in this letter. If you have any questions, please telephone M. C. Bryan at (615) 365-8819.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

E. C. Wallace, Manager Nuclear Licensing and Regulatory Affairs

Enclosure

cc (Enclosure):

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### ENCLOSURE

## WATTS BAR NUCLEAR PLANT INITIAL STARTUP TEST LIST OF COMMITMENTS

- 1. Final Safety Analysis Report (FSAR) Table 14.2-2B will be revised in a future amendment to include SU-6.2, Loss of Offsite Power for Unit 2.
- 2. TVA will ensure that the FSAR Sections 9.4.6.2, 6.5.1.2.3, Tables 6.5-5 and 14.2-1, TVA-9B, and appropriate design basis documents are revised to be consistent.