



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

January 18, 2008

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop: OWFN P1-35
Washington, D.C. 20555-0001

In the Matter of)
Tennessee Valley Authority)

Docket No. 50-391

**WATTS BAR NUCLEAR PLANT (WBN) - UNIT 2 – COMMENTS ON
DRAFT INSPECTION MANUAL CHAPTER 2517, WATTS BAR UNIT 2
CONSTRUCTION INSPECTION PROGRAM**

The purpose of this letter is to provide comments on the proposed draft NRC Inspection Manual IMC 2517, Watts Bar Unit 2 Construction Inspection Program. TVA appreciates the opportunity to review this inspection manual, and the enclosure to this letter contains specific comments for your review and consideration.

If you have any questions, please contact me at (423) 365-2351.

Sincerely,

Masoud Bajestani
Watts Bar Unit 2 Vice President

Enclosure
cc: See page 2

A001
NRR

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cc (Enclosure):

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Comment No.	Step No.	Page No.	Comments
1	03.02	2	Please clarify that design and licensing basis codes and regulations are those originally contained in the Unit 1 and Unit 2 safety evaluation report.
2	03.05	2	TVA understands NRC's desire to pilot certain 10 CFR Part 52 inspection processes during Watts Bar Unit 2 construction. It is requested that NRC consider the potential for distraction and resource impacts when piloting the 10 CFR Part 52 processes.
3	2517-06	5	Please include a discussion of SECY-07-0096, "Possible Reactivation of Construction and Licensing Activities for the Watts Bar Nuclear Plant Unit 2," in this section to provide the basis for using the licensing basis for Unit 1 to establish the licensing basis for Unit 2.
4	2517-06	6	In the second paragraph, consider rewording the last sentence to read "...for Watts Bar Unit 1; however, no <i>final</i> conclusions were stated for Watts Bar Unit 2.
5	07.01	7	In third paragraph, please clarify by example or definition what "open items" constitute.
6	07.01	8	In the second paragraph, there is a statement that "...the applicant will submit a closure package to the NRC." TVA had previously understood that closure packages would be developed and made available at the Site for NRC inspection and not submitted. Please clarify the expectation for closure package review.
7	08.01 a	10	Please consider rewording the fourth sentence as follows: "If the programmatic aspects of a program were previously verified by NRC inspections for Watts Bar Unit 1, then that <i>programmatic aspect</i> ..." Please clarify the discussion related to reverifying a program for Watts Bar Unit 2 if a vendor is changed. If the vendor uses the same methodology and/or process, would the entire program require re-review?
8	08.02 a	11	It is suggested that the first sentence of this step be deleted. While 10 CFR Part 52 guidance is in place, regulation does not preclude applying for a construction permit in accordance with 10 CFR Part 50.
9	11.03	16	It is requested that this step be further clarified to specify the conduct of separate meetings for Watts Bar Unit 1 and Watts Bar Unit 2 during construction due to the different nature and issues that could be presented.

Watts Bar MC 2517 Comments
Enclosure

10	11.06	19	Please provide clarification, possibly by example, how the regulatory response prescribed by the Reactor Oversight Process (ROP) Action Matrix would be used even though Watts Bar Unit 2 has not been transitioned to the ROP.
11	2 (a)	B-6	Is the discussion of design and licensing requirements a reference to the original design and licensing basis for Watts Bar Units 1 and 2?
12	d.	C-5	Please consider deleting "in the turbine building" as it could be confusing when discussing Seismic Class I supports.