TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

May 31, 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
50-327
50-328

Reference: R. H. Shell's letter to you dated April 18, 1985.

In response to your letter to H. G. Parris dated April 2, 1985 pertaining to Watts Bar Nuclear Plant and your letter to H. G. Parris dated March 22, 1985 pertaining to Sequoyah Nuclear Plant with regard to your "Request for Additional Information Following Preliminary Staff Reviews of Applicant Responses to Generic Letter 83-28," the following is our additional response to item 2.2.1.6 of Generic Letter 83-28.

TVA has treated the terms "important-to-safety" and "safety-related" as being synonymous or equivalent since they have been used interchangeably in NRC regulatory documents and by the industry. Our classification system described in section 3.2 of the Final Safety Analysis Report (FSAR) includes what TVA considers as safety-related plant features.

TVA recognizes that there are specific categories of items which are not safety-related but which are subject to special design, construction, and/or operations requirements. These special requirements include anything more than standard industry practices but less than those for "safety-related" equipment. The source of these requirements may include:

1. NRC regulations, requirements, and guides in the Code of Federal Regulations, standard review plan, regulatory guides, and branch technical positions;

2. TVA commitments to NRC such as those contained in FSARs, technical specifications, responses to NRC inspection reports, generic letters, IE bulletins, and questions and;

3. Internal TVA policy related to personnel safety, unit availability, or other considerations.

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Director of Nuclear Reactor Regulation May 31, 1985

For these items, the application regulation, standard commitment, and/or policy generally is delineated in design input such as design criteria documents and implemented through design drawings, system descriptions, procurement specifications, design, construction and operation procedures, and/or program manuals (e.g., the Security Manual and the Health Physics Manual). The intent of this approach is to ensure that any special requirements are commensurate with the functions of specific equipment.

We do not assign a unique name such as "important-to-safety" or "ANS Class 4" to those features described above nor do we maintain a comprehensive listing of such items.

This response is generally consistent with SECY-85-119 dated April 5, 1985. For Sequoyah and Watts Bar, our additional response to item 2.2.2, requested by the subject referenced letters, was submitted to NRC by the May 31, 1985 letter from me to Hugh Thompson.

If you have any questions concerning this matter, please get in touch with W. C. Ludwig at FTS 858-4882.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer

J. A. Domer, Chief
Nuclear Licensing Branch

Sworn to and subscribed before me
this 31st day of May 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