

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

September 22, 1983

83 SEP 26 A 8:50

WBRD-50-390/82-49  
WBRD-50-391/82-46

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

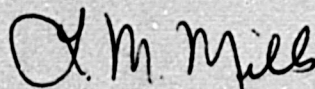
**WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - FAILURE TO EVALUATE OPERATOR  
ACTIONS TO REALIGN ERCW TRAIN A - WBRD-50-390/82-49, WBRD-50-391/82-46 -  
FINAL REPORT**

The subject deficiency was initially reported to NRC-OIE Inspector R. V. Crlenjak on May 10, 1982 in accordance with 10 CFR 50.55(e) as NCR WBN QAB 8203. Interim reports were submitted on June 8 and September 14, 1982, and January 20 and May 24, 1983. Enclosed is our final report. TVA no longer considers 10 CFR 50.55(e) applicable to this deficiency.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Licensing

Enclosure

cc (Enclosure):

Mr. Richard C. DeYoung, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Records Center  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
Atlanta, Georgia 30339

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## ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
FAILURE TO EVALUATE OPERATOR ACTION TO REALIGN ERCW TRAIN A  
NCR WBN QAB 8203  
WBRD-50-390/82-49, WBRD-50-391/82-46  
10 CFR 50.55(e)  
FINAL REPORT

### Description of Deficiency

Certain manual operator actions are required to adjust the position of several valves associated with the component cooling system (CCS) heat exchangers after a design basis accident. The effect on the system during the interim period before these manual actions, had not been evaluated.

Failure to evaluate this interim period during initial design was caused by the fact that hands-off operation for a definite period of time following an accident was not a formal design requirement. It was not documented in any regulatory document, industry standard, TVA design criteria document, engineering procedure, or in the Safety Analysis Report.

### Safety Implications

Before the CCS valves are repositioned, the ERCW flow rate to the CCS heat exchangers will be greater than required, thereby diverting water from other system users. However, it is not obvious that flow would be less than the design requirements for any system user since certain major loads would not be aligned during this interval and since river water elevation would be normal.

An analysis has been performed to evaluate ERCW system performance during the initial 10 minutes following a design basis accident. It was found that the system is able to deliver design flow to all loads during the period. TVA has, therefore, determined this condition is not adverse to the safe operation of the plant and is no longer reportable under 10 CFR 50.55(e).

There is still no regulatory requirement or industry standard requiring hands-off operation for a definite period after an accident. However, ANSI N660/ANS 51.4, "Proposed American National Standard Criteria for Safety-Related Operator Actions," was issued for trial use in January 1977. In future plants, this document, or revisions of it, will be used as a guide in evaluating problems of this nature.