

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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January 25, 1985

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNIT 1 - NRC-OIE INSPECTION OF THE PROOF AND REVIEW
VERSION OF THE WATTS BAR UNIT 1 APPENDIX A TECHNICAL SPECIFICATIONS

An NRC-OIE inspection of the "proof and review" version of the Watts Bar Nuclear Plant (WBN) unit 1 Appendix A Technical Specifications was conducted during the period of June 25-29, 1984. Inspection Report 50-390/84-50 documenting the inspection was issued on August 29, 1984.

As noted in the inspection report, the Watts Bar Technical Specifications were compared with Revision 4 of the Westinghouse Standard Technical Specifications, the Sequoyah Technical Specifications and technical specifications of similarly designed plants. Also, to ensure that the technical specifications accurately reflect the as-built configuration of the plant, a field verification was performed by system walkdowns of the applicable systems. The inspection concluded that the technical specifications accurately reflected the as-built plant and were essentially complete. However, various minor discrepancies and differences were identified between the Watts Bar Technical Specification and those of comparison. Attachment 3 of the inspection report identified those items that TVA had agreed to either take action on or to review to determine if action was necessary.

By letters dated June 19 and September 14, 1984, TVA submitted comments/proposed modifications to the proof and review version of the WBN unit 1 Technical Specifications. These submittals addressed the majority of the items identified in attachment 3 to the inspection report.

The enclosure to this letter has been prepared to assist in the resolution of the NRC-OIE identified discrepancies/differences. The enclosure provides a listing of the like number items of attachment 3 to the inspection report and is appropriate either; (1) identifies the action which has been taken to date to resolve the item, (2) addresses the item, (3) provides TVA's anticipated actions to resolve the item.

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U.S. Nuclear Regulatory Commission

January 25, 1985

If you have any questions, please get in touch with D. B. Ellis at
FTS 858-2681.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Homer
for J. W. Hufham, Manager
Licensing and Regulations

Enclosure

cc (Enclosure):

Mr. Richard C. DeYoung, Director
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
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ENCLOSURE

NRC-OIE
INSPECTION OF THE WATTS BAR UNIT 1 APPENDIX A
TECHNICAL SPECIFICATIONS
INSPECTION REPORT NO. 50-390/84-50

Identifier

Status

4.1.2.3.1 and 4.1.2.4

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to SR 4.1.2.3.1 and 4.1.2.4 changing the charging pump operability acceptance criteria from differential pressure to discharge pressure. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.3.3.1 (Table 3.3-6)

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included proposed revisions to Table 3.3-6 to improve clarity and eliminate redundancy. NRC-NRR incorporated TVA's proposed revisions in part into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.3.2 (Table 3.3-4)

The NRC inspectors' recommended change concerning item 7b of Table 3.3-4 was included in TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specification.

3.3.3.1 (Table 3.3-6)

The NRC inspectors' comments were partially addressed by TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984. The FSAR and/or the Technical Specifications will be revised as appropriate to ensure that the nomenclator used for the subject monitors is applied consistently.

Table 3.3-3

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to Table 3.3-3 incorporating the P-14 interlock. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specification.

4.3.3.3.2

TVA's Technical Specification submittal to NRC-NRR September 14, 1984 included a proposed revision to SR 4.3.3.3.2 deleting the phrase ". . . greater than or equal to 0.01g. . . ." NRC-NRR, however, did not approve this revision for incorporation into the "final draft" version of the Watts Bar U1 Technical Specifications.

4.3.3.5

TVA's Technical Specification submittal to NRC-NRR dated June 19, 1984 included a proposed revision to Table 4.3-6 revising the calibration frequency of the source range nuclear flux instruments to each refueling outage. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.3.3.6 (Table 3.3-10)

TVA believes that the designation of instrument 15 of Table 3.3-10 is adequate as written (Containment Sump Water Level). As such, no revision is proposed.

3.3.3.7.d

Sequoyah technical specification 3.0.3 and Watts Bar technical specification 3.0.3 differ in that Watts Bar technical specification 3.0.3 specifies that it is not applicable in modes 5 or 6. Therefore, no revision to technical specification 3.3.3.7.d is necessary.

Table 4.3-8

The FSAR and/or the Technical Specifications will be revised as appropriate to ensure that the nomenclator used for the subject monitors is applied consistently.

Table 4.3-8

TVA has evaluated the NRC inspectors' comment regarding the measurement of the dilution flow used in radioactive releases. Watts Bar uses the diffuser discharge effluent flow for dilution. Item 3.d of table 3.3-12 addresses the diffuser discharge effluent line flow monitor.

3.3.3.9 (Table 3.3-12)

The parameter to be monitored is the quantity of radioactivity material in the tanks which is governed by technical specification 3.11.1.4. As such, no proposed changes to add a time limitation for additions to these tanks is necessary.

3.3.3.9 (Table 3.3-12)

See response to NRC comment on Table 4.3-8 regarding the same concern.

Table 4.3-9 Notations

The FSAR and/or the Technical Specifications will be revised as appropriate to ensure that the nomenclator used for the subject monitors is applied consistently.

Table 3.3-13

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to ACTION statement 40 of table 3.3-13 regarding the inoperability of the H₂ and O₂ monitors. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

The purpose of the equipment listed in table 3.3-13 of the draft Watts Bar technical specifications is to provide the capability of monitoring normal gaseous effluent releases for accountability in accordance with 10 CFR Part 20. These monitors and samplers are used to show compliance with technical specifications 3.11.2.1, 3.11.2.2, 3.11.2.3, and 3.11.2.4. Accountability measurements for radioiodines and particulates are done with samplers. The frequency for sampler analysis is specified in table 4.11-2. The iodine and particulate monitors are not used for accountability purposes because of the inherent inaccuracy associated with the monitor design. As such, technical specifications do not place operability requirements on these monitors. Instead, the technical specifications require operability of the samplers because they are used for accountability.

Radioiodine and particulate sampler operability is not specified for the Service Building ventilation system because of the very low level of releases expected from this source. This ventilation system services the radiochemical laboratory, titration room, and health physics laboratory. As noted in the FSAR, no detectable concentrations are expected in this exhaust stream. TVA does not expect this exhaust stream to contribute to offsite dose. No requirements for

radioiodine or particulate sampling were proposed because of this fact. NRC-NRR has reviewed this position during the development of the radiological effluent technical specifications and has agreed with it.

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to ACTION statement 39 of table 3.3-13 to better define the type of radioactivity analysis to be performed. NRC-NRR, however, did not approve this revision for incorporation into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.4.3

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to technical specification 3.4.3 incorporating the indicated measurement used by the reactor operators. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.4.4
ACTION

Technical specification 3.4.4 has been revised to address excessive seat leakage of the PORVs.

4.4.6.1.a

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included proposed revisions to table 4.3-3 to improve clarity and eliminate redundancy.

NRC-NRR incorporated TVA's proposed revisions in-part into the "final draft" version of the Watts Bar U1 Technical Specifications.

4.4.6.2.1.d

TVA has reviewed its proposed wording for SR 4.4.6.2.1.d regarding performance of inventory balance during steady state conditions and believes that this clarification is necessary for proper interpretation of the requirement.

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to SR 4.4.6.2.1.d to clarify the fact that several alarms can indicate intersystem leakage.

NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

4.5.3.2

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to SR 4.5.3.2 to clarify the methods that could be used to place a pump out of service. NRC-NRR subsequently incorporated this revision in-part into the "final draft" version of the Watts Bar U1 Technical Specifications.

4.6.1.8.d.4

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to SR 4.6.1.8.d.4 addressing annulus in-leakage acceptance criteria. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

4.6.1.8.d.4

TVA does not believe that a time requirement associated with maintaining negative pressure in the annulus is appropriate since annulus in-leakage will be measured.

4.6.1.9.3

SR 4.6.1.9.3 is adequate except that the leakage rate limit should be corrected to $0.05 L_a$. TVA will submit a proposed revision to NRC-NRR in the near future.

3.6.3 ACTION

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to technical specification 3.6.3 requesting an exemption to 3.0.4 on a valve-by-valve basis. NRC-NRR however, did not approve this revision for incorporation into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.6.3 (Table 3.6-2)

The noted typographical errors were corrected in the "final draft" version of the Watts Bar U1 Technical Specifications.

3.6.4.2

TVA believes that the current wording provides an adequate description of the subject hydrogen recombiner systems.

4.6.4.3.b

By letter dated September 15, 1982, TVA proposed SR 4.6.4.3.b as written in the "proof and review" version of the Watts Bar U1 Technical Specifications. TVA maintains its position that a visual inspection of the igniters is satisfactory.

NRC-NRR revised the SR in the "final draft" version of the Watts Bar U1 Technical Specifications to require temperature verification of the igniters. TVA will initiate further discussion on this matter.

3.7.11.2 ACTION

TVA has evaluated the NRC inspectors' proposal regarding fire detector inoperability. The proposed changes provided in TVA's letter to NRC-NRR dated September 14, 1984 addresses the concern of automatic actuation system inoperability due to fire detector zone inoperability regardless of the number of detectors in the zone. TVA believes that this approach is less cumbersome than changes to the ACTION statement for suppression systems.

3.7.11.3 ACTION

See response to NRC comment on 3.7.11.2 above.

3.8.1.1

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to technical specification 3.8.1.1 to properly designate DG set(s). NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.8.1.1 ACTION

TVA will submit a proposed revision incorporating the NRC inspectors' comment regarding proposed ACTION statement (f). ACTION statement (c) has been revised to refer to DG set.

4.8.1.1.2.b.1

SR 4.8.1.1.2.b.1 has been revised to incorporate the NRC inspectors' recommended word change.

4.8.1.1.2.d.2

The correct value for the largest load is 600 kw.

4.8.1.1.2.d.6.c

SR 4.8.1.1.2.d.6.c has been revised to incorporate the NRC inspectors' recommended word change.

4.8.1.1.2.d.12

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to SR 4.8.1.1.2.d.12 incorporating the subject emergency stop feature. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

4.8.1.1.2.d.7

The correct specification reference in the "Proof and Review" version is 4.8.1.1.2.d.6(b) however, the "final draft" version is incorrect. TVA will notify NRC-NRR of this error.

4.8.1.1.3.b

TVA has reviewed the FSAR and the technical specifications and found them to be consistent. The FSAR specifies nominal design values for the battery and charger parameters. Surveillance requirement 4.8.1.1.3.b lists testing that must be done every 92 days or whenever the battery has been severely discharged or overcharged. The discharge and overcharge voltage values specified in the technical specifications are based on the manufacturer's lower and upper limits on cell voltage. These are limits and not nominal values. They are not indicative of battery condition in themselves; they are used to initiate additional testing. The category A and B limits of table 4.8-2 still must be met at the frequencies specified in the technical specifications.

3.8.1.1.b

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to technical specification 3.8.1.1.b incorporating the NRC inspectors' recommended changes. NRC-NRR subsequently incorporated these revisions into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.8.1.2.b

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to technical specification 3.8.1.1.b incorporating the NRC inspectors' recommended changes. NRC-NRR subsequently incorporated these revisions into the "final draft" version of the Watts Bar U1 Technical Specifications.

IdentifierStatus

4.8.1.2

The noted incorrect specification reference was corrected in the "final draft" version of the Watts Bar U1 Technical Specifications.

4.8.2.1.a.2

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to SR 4.8.2.1.a.2 providing the correct value for the battery float voltage. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specification

4.8.2.1.c.4

TVA has reviewed the battery charger capacity. The value specified in SR 4.8.2.1.c.4 is consistent with the expected load on the charger during normal operation. SR 4.8.2.1.c.4 has been revised to specify a battery charger test of 8 hours duration.

4.8.2.1.d

To incorporate the words "during shutdown" would require a two-unit mode 5 shutdown. The SR can be performed during operation.

4.8.2.1.e

SR 4.8.2.1.e has been revised to incorporate the NRC inspectors' proposed word change.

3.9.1

The initial part of the subject sentence has been deleted in Revision 5 of the Westinghouse STS.

3.9.2

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to technical specification 3.9.2 to specify that the monitors be OPERABLE and operating. NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical specification.

3.9.5

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to technical specification 3.9.5 incorporating the NRC inspectors' recommended changes regarding control room-refueling station communications.

NRC-NRR however, did not approve these revisions for incorporation into the "final draft" version of the Watts Bar U1 Technical Specification.

4.9.6.1

Sequoyah technical specification 3.0.3 and Watts Bar technical specification 3.0.3 differ in that Watts Bar technical specification 3.0.3 specifies that it is not applicable in modes 5 and 6.

TVA's Technical Specification submittal to NRC-NRR dated September 14, 1984 included a proposed revision to SR 4.9.6.1 changing ". . . automatic mechanical load cutoff when the crane . . ." to ". . . automatic mechanical load cutoff before the crane . . ." NRC-NRR subsequently incorporated this revision into the "final draft" version of the Watts Bar U1 Technical Specifications.

3.9.10

Sequoyah technical specification 3.0.3 and Watts Bar technical specification 3.0.3 differ in that Watts Bar technical specification 3.0.3 specifies that it is not applicable in modes 5 or 6.

3.9.12 ACTION

Revision 5 of the Westinghouse STS includes not applicability statements for specifications 3.0.3 and 3.0.4.

3.1.2.4

The ventilation systems are appropriately identified in the FSAR. No changes to the technical specifications are planned with respect to this item.

Table 3.12-1

The noted typographical errors were corrected in the "final draft" version of the Watts Bar U1 Technical Specifications.

6.8.1

TVA will submit a recommended change to include the fire protection program under 6.8.1 in the next Technical Specification submittal to NRC-NRR.