

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 1578 Lookout Place

MAR 15 1988

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

Gentlemen:

In the Matter of)	Docket Nos.	50-259
Tennessee Valley Authority)		50-260
)		50-296
)		50-327
)		50-328
)		50-390
)		50-391
)		50-438
)		50-439


INTEGRATED SAFETY ASSESSMENT PROGRAM (ISAP) II (GENERIC LETTER 88-02)

Enclosed is TVA's response to the subject generic letter for the Browns Ferry, Sequoyah, Watts Bar, and Bellefonte Nuclear Plants. As indicated in the enclosure, TVA is interested in participating in ISAP II.

If there are any questions regarding this matter, please telephone M. K. Brandon at (615) 751-8076.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission

MAR 15 1988

cc (Enclosure):

Mr. K. P. Barr, Acting Assistant Director
for Inspection Programs
TVA Projects Division
U.S. Nuclear Regulatory Commission
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Bellefonte Resident Inspector
Bellefonte Nuclear Plant
P.O. Box 2000
Hollywood, Alabama 35752

Browns Ferry Resident Inspector
Browns Ferry Nuclear Plant
Route 12, Box 637
Athens, Alabama 35611

Sequoyah Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy Daisy, Tennessee 37379

Watts Bar Resident Inspector
Watts Bar Nuclear Plant
P.O. Box 700
Spring City, Tennessee 37381

Enclosure

Integrated Safety Assessment Program (ISAP) II

Response Format to Generic Letter 88-02

Facility Name: Browns Ferry, Sequoyah, Watts Bar, Bellefonte

Utility: Tennessee Valley Authority

Individual Contact Name: M. K. Brandon Phone Number: (615) 751-8076

An expression of interest will not be considered a commitment to participate on the part of the utility.

1. Would you be interested in participating in ISAP II? If so, in what time frame?

Yes, in the following sequence for our facilities

Browns Ferry - first
Sequoyah - second, and
Watts Bar and Bellefonte - after licensed for operation

2. Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question-and-answer period would be beneficial before making a decision?

Yes

3. Would you be interested in a one-on-one meeting with NRC to discuss your particular facility or facilities?

Yes, after the industry/NRC seminar.

4. If you remain undecided regarding participation, what additional information do you need in order to make a decision?

N/A

5. Do you have any potential concerns about participating in ISAP II?

- The option to include the schedule for significant items in the license condition is contrary to the intent of the program and should not be necessary.
- The handling of currently scheduled, regulatory-driven modifications that are shown to be insignificant by probabilistic risk assessment (PRA) is not clear.
- The potential use of new licensing criteria is a concern because requirements could be imposed that lie outside a facility's licensing basis.

6. Do you have any suggestions for program improvements or changes?

- The general rule for scheduling discussed on page 2, second paragraph of enclosure 1 to GL 88-02, is contrary to the general principles of integrated scheduling. Unless there are exigent circumstances, all issues should be scheduled based on their priority and resource availability.
- More PRA guidance from the NRC staff would be beneficial.