

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

October 1, 2008

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

n the Matter of)
Tennessee Valley Authority)

Docket No. 50-391

WATTS BAR NUCLEAR PLANT (WBN) UNIT 2 - INITIAL RESPONSE TO NRC GENERIC LETTER (GL) 2008-01: "MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS"

Reference:

TVA letter dated January 29, 2008, "Watts Bar Nuclear Plant (WBN) – Unit 2 –

Regulatory Framework for the Completion of Construction and Licensing

Activities for Unit 2"

The purpose of this letter is to respond to GL 2008-01 for WBN Unit 2. WBN Unit 2 is a holder of a construction permit and as such was not an addressee of GL 2008-01. In the reference, TVA provided an "Open Action Required for Licensing" to respond to GL 2008-01 on or before October 10, 2008. TVA intends to complete the evaluations and modifications to support closure of this GL prior to fuel load.

The NRC issued GL 2008-01 to request that each licensee evaluate the licensing basis, design, testing and corrective actions for the Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems to ensure gas accumulation is maintained less than the amount that challenges the operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

Enclosure 1 provides the NRC requests and TVA's responses. Enclosure 2 provides the listing of open actions required for licensing made in Enclosure 1.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 1st day of October, 2008.

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

Sincerely,

Masoud Bajestani

Watts Bar/Ún/t 2 Vice President

Enclosures

cc (Enclosures):

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Enclosure 1

WBN Unit 2 Response to NRC Generic Letter (GL) 2008-01: Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems

In GL 2008-01, NRC requested each licensee provide the following information:

- (a) A description of the results of evaluations that were performed pursuant to the actions requested of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;
- (b) A description of all corrective actions, including plant programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

WBN Unit 2 does not have an operating license. The Emergency Core Cooling System (ECCS) (Safety Injection and Centrifugal Charging), Residual Heat Removal (RHR), and Containment Spray Systems (CSS) are not in service. The design of the ECCS, RHR, and CSS are not completed. TVA is in the process of performing the detailed engineering for the construction completion of WBN Unit 2. This issue will be addressed as part of that detailed engineering. Engineering for these systems is currently scheduled to be completed by May 2010. TVA will provide a submittal within 45 days of completion of the engineering for these systems. The submittal will provide a description of the design features and other considerations included in the completed design that will serve to preclude operability impacts due to the accumulation of gas in the subject systems, a schedule for completing the actions, and the basis for that schedule.

During the completion and preoperational testing of the design, TVA will follow industry testing and analysis developed to assess gas transport. If Technical Specification (TS) changes are determined to be necessary based on responses to the GL, TVA will review the TS Task Force change traveler for adoption at WBN Unit 2.

WBN Unit 2 will complete the required modifications and provide a submittal consistent with the information requested in the GL 90 days prior to fuel load. The submittal will provide: a statement regarding which actions were completed, the schedule for completing the remaining actions, and the basis for that schedule.

Enclosure 2 Open Actions Required for Licensing

- 1. TVA will provide a submittal within 45 days of completion of the engineering for the ECCS, RHR, and CSS systems. The submittal will provide a description of the design features and other considerations included in the completed design that will serve to preclude operability impacts due to the accumulation of gas in the subject systems, a schedule for completing the actions, and the basis for that schedule.
- 2. WBN Unit 2 will complete the required modifications and provide a submittal consistent with the information requested in the GL 90 days prior to fuel load. The submittal will provide: a statement regarding which actions were completed, the schedule for completing the remaining actions, and the basis for that schedule.