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 FACIL: 50-438 Bellefonte Nuclear Plant, Unit 1, Tennessee Valley Au 0500.0438  
 50-439 Bellefonte Nuclear Plant, Unit 2, Tennessee Valley Au 0500.0439

AUTH. NAME AUTH. AFFILIATION  
 WISENBURG, M.R. Tennessee Valley Authority  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests extension until 830123 for submitting specific small break LUCA analyses required by TMI Action Plan Item 3.K.3.31. Deferral will facilitate B&W owners group effort for improving evaluation model.

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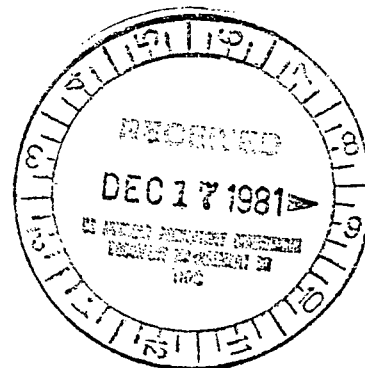
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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

December 11, 1981



Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

In the Matter of the Application of ) Docket Nos. 50-438  
Tennessee Valley Authority ) 50-439

As an operating license applicant, TVA is participating in the B&W Owners Group effort to improve the small break LOCA evaluation model. This effort should resolve concerns with the model as identified in NUREG-0737, Item II.K.3.31. TVA must also develop plant specific calculations using the improved small break model to revise the existing Bellefonte FSAR chapters 6 and 15 analyses. However, we observe a schedule incompatibility between the submittal and approval of the small break model and the submittal of the Bellefonte specific analyses based on this model.

To complete the current action plan, TVA must provide the Bellefonte specific calculations by September 1, 1982 or four months before the expected issuance of the SER, whichever is later. The schedule for the submittal of the small break evaluation model for the operating B&W plants with addenda for the 205 plant owners may not permit your review and approval before the Bellefonte specific analyses must be substantially complete. A significant change required in the model evolving from your review could cause extensive reanalysis and prevent a timely submittal of the results.

We have discussed this schedule matter with B&W and have satisfied ourselves that the schedule for submitting the small break LOCA model is tight. Also, no significant reduction appears feasible in the time required for completion of the Bellefonte specific analyses. We believe, therefore, that a modification to the implementation requirement is the only satisfactory solution to the schedule problem. Therefore, we request a deferral for the submittal of the Bellefonte specific analyses to a schedule consistent with that of the operating B&W plants. This schedule, as outlined in NUREG-0737, would require TVA to submit the Bellefonte specific small break analyses by January 1, 1983 or one year after the staff approval of the model, whichever is later. Please consider our request and give us your approval of this schedule strategy as early as possible in order for us to avoid impacting the B&W Owners Group program.

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Mr. Harold R. Denton, Director

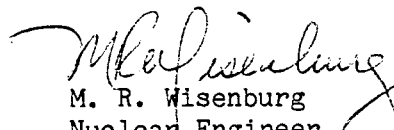
December 11, 1981

TVA also wishes to encourage you to give high priority to the review of the small break model when it is submitted and thus achieve the minimum impact on the overall schedule for implementing NUREG-0737 requirements and plant licensing. TVA will be working with the B&W Owners Group and your staff to resolve concerns with the analytical methods as they arise. TVA hopes this strategy will help to minimize your review after the formal report submittal and should also help your subsequent review of the specific chapter 6 and 15 amendments for all B&W plants.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
M. R. Wisenburg  
Nuclear Engineer

Sworn to and subscribed before me  
this 11<sup>th</sup> day of December 1981

Paulette H. White  
Notary Public

My Commission Expires 9-5-84

cc: Mr. James McFarland  
Senior Project Manager  
Babcock & Wilcox Company  
P.O. Box 1260  
Lynchburg, Virginia 24505