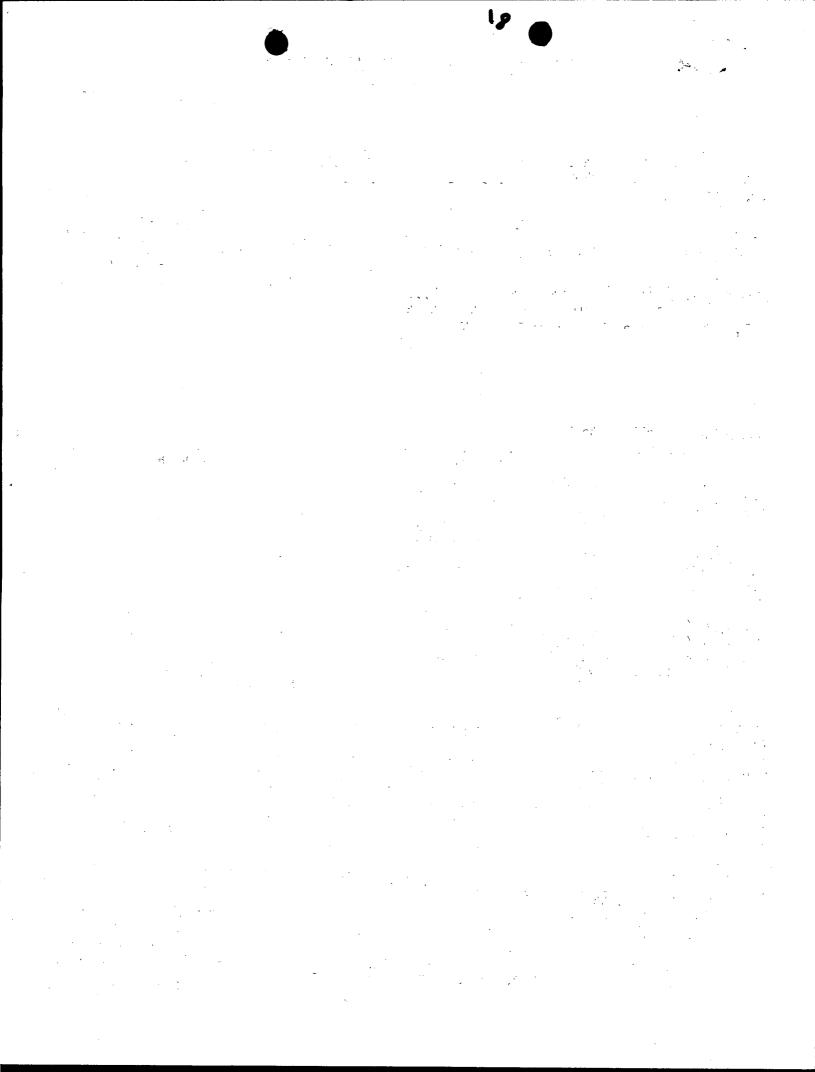
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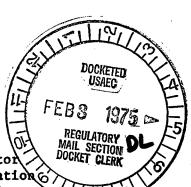
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January 30, 1975

CHATTANOOGA, TENNESSEE 37401



Mr. Edson G. Case, Acting Director Office of Nuclear Reactor Regulation 6 U.S. Nuclear Regulatory Commission Washington, DC 20555

Dear Mr. Case:

In the Matter of Tennessee Valley Authority

Docket Nos. 50-438 50-439

In our letter to you dated September 30, 1974, TVA requested an extension in the date for providing our evaluation of the effects of Anticipated Transients Without Scram (ATWS) for our Bellefonte Nuclear Plant from October 1, 1974, to February 1, 1975. A letter from A. Giambusso to James E. Watson dated October 9, 1974, granted the requested extension.

The Babcock and Wilcox Company has submitted a topical report entitled "Babcock and Wilcox Anticipated Transients Without Scram Analysis" (BAW-10099). The results of the Babcock and Wilcox analyses are within the guidelines for ATWS consequences discussed in BAW-10099. These guidelines are based on the criteria established by the Regulatory Staff's "Technical Report on Anticipated Transients Without Scram for Water-Cooled Power Reactors" (WASH-1270).

TVA has reviewed BAW-10099 to ensure that plant parameters and assumptions are appropriate for the Bellefonte Nuclear Plant. We find that the transient analyses and sensitivity studies presented for the 205 fuel assembly reactor in the Babcock and Wilcox topical report are applicable to the Bellefonte Nuclear Plant. Based upon this review, we conclude that no design changes to the Bellefonte Nuclear Plant are required to mitigate the consequences of ATWS.

Mr. Edson G. Case, Acting Director

January 30, 1975

Further, TVA believes the implementation requirements of WASH-1270 should be reconsidered for all classes of plants. The results of the draft "Reactor Safety Study," WASH-1400, clearly show that ATWS is an event of minimal risk to the public health and safety. The probability of an ATWS occurrence is so low that awaiting the finalization of WASH-1400 would result in an extremely small incremental increase in the likelihood of an ATWS; whereas, formal implementation of the proposed ATWS requirement would impose a significant additional burden on the industry; a burden we believe to be unwarranted. We propose that until WASH-1400 is finalized the implementation schedule for ATWS be withdrawn and subjected to further consideration in light of the final determinations of that report.

Very truly yours,

J. E. Gilleland

Assistant Manager of Power