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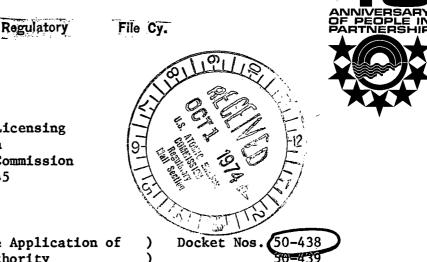
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CHATTANOOGA, TENNES

September 30, 1974



10181

Mr. Edson G. Case Acting Director of Licensing Office of Regulation U.S. Atomic Energy Commission Washington, DC 20545

Dear Mr. Case:

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In the Matter of the Application of Tennessee Valley Authority

In our letter dated December 26, 1973, we indicated that our evaluation of Anticipated Transients Without Scram (ATWS) for the proposed Bellefonte Nuclear Plant would be transmitted to you by October 1, 1974. We understand that the AEC Regulatory Staff has been conducting meetings on the subject of ATWS with the NSSS vendors. TVA has not been privileged to participate in these generic meetings. Recently our NSSS vendor for Bellefonte, the Babcock and Wilcox Company, informed us that their ATWS analysis will not be completed until about December 13, 1974. We are not aware of the AEC review status or any further clarification of AEC positions on ATWS nor of how these might be reflected in generic ATWS topical reports. Pending further consideration and clarification of this entire matter, we would like to change our submittal schedule for our evaluation of the ATWS situation for the Bellefonte Nuclear Plant to February 1, 1975.

ATWS has been under study by the AEC Regulatory Staff, the ACRS, NSSS vendors, and utilities for some time. The consensus industry position has been that ATWS, as postulated by the AEC, is not credible. Confirming that ATWS is an extremely low-risk event, the recent AEC-funded "Reactor Safety Study" (WASH-1400) indicates that ATWS is an event of negligible consequences to the public health and safety. The "Interim General Statement of Policy" related to WASH-1400 which was published in the Federal Register on August 27, 1974, indicates that the AEC is not going to relax requirements Mr. Edson G. Case

September 30, 1974

based on the conclusions of WASH-1400 while the report is in draft form. TVA believes that it would also be appropriate to defer new licensing requirements for highly unlikely events, such as ATWS, until the report is finalized. Therefore, TVA believes that ATWS should not be a design basis event for any of its nuclear plants.

Very truly yours,

J. E. Gilleland Assistant to the Manager of Power