



830 Power Building  
TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

December 30, 1976



Director of Nuclear Reactor Regulation  
Attention: Mr. Roger S. Boyd, Director  
Division of Project Management  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Boyd:

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

In your letter dated June 25, 1976, you requested analyses of ATWS events as they relate to Bellefonte units 1 and 2.

B&W has submitted a letter report to R. Heineman, Director, Division of System Safety, dated December 3, 1976. This report provides analyses of the B&W 205 fuel assembly plant type. These results were generated by the December 1975 NRC Status Report requirements and represent the most adverse ATWS events. These results are generally applicable to Bellefonte units 1 and 2. We would like to take this opportunity to reaffirm our support of B&W's position that the status report models and assumptions are overly conservative and place requirements on units more restrictive than those proposed in WASH-1270.

The B&W report also identifies a design change appropriate for the conditions predicted by the status report assumptions and analysis techniques. Thus, the staff has available, in consideration of the licensing review schedule of the Bellefonte units, sufficient information to satisfy your request of June 25, 1976.

Furthermore, in the event that a design change is deemed necessary to ensure that the limits of WASH-1270 will not be violated following an ATWS event, the general approach of a backup scram system, as proposed by B&W appears to be a viable and effective alternative available to finally resolve ATWS as a licensing concern. TVA will continue to evaluate the B&W proposal among other alternatives should a design change be required.

Very truly yours,

J. E. Gilleland  
Assistant Manager of Power

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