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AUTH. NAME AUTHOR AFFILIATION
 WALLACE, E.G. Tennessee Valley Authority
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards util position paper re safe shutdown condition for DBA at facilities. Suggests initial meeting on topic during wk of 910708.

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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

JUN 20 1991

U.S. Nuclear Regulatory Commission
ATTN.: Document Control Desk
Washington, DC 20555

Gentlemen:

In the Matter of the Application of) Docket No. 50-438
Tennessee Valley Authority) 50-439

**BELLEFONTE NUCLEAR PLANT (BLN) - TRANSMITTAL OF TVA POSITION REGARDING
SAFE SHUTDOWN (TAC #80218)**

Enclosed for staff review is the TVA position paper regarding the safe shutdown condition for BLN. While a written staff position on the enclosure is not requested, TVA would appreciate staff comments on this position by August 23, 1991. As discussed with the NRC staff and management, timely resolution of potential issues from your review is important to TVA's consideration of the nuclear option at BLN.

Bruce S. Schofield will contact the BLN project manager to schedule a working level meeting to assist in the staff's review of this position. A suggested timeframe for this initial meeting is the week of July 8.

If you have any questions, please telephone Mr. Schofield at (205) 574-8058.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mary E. Burzynski
E. G. Wallace, Manager
Nuclear Licensing and
Regulatory Affairs

Enclosure
cc: See page 2

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PDR ADOCK 05000438
A PDR

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U.S. Nuclear Regulatory Commission

JUN 20 1991

Enclosure

cc (Enclosure):

Ms. S. C. Black, Deputy Director
Project Directorate II-4
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

NRC Resident Inspector
Bellefonte Nuclear Plant
P.O. Box 2000
Hollywood, Alabama 35752

Mr. M. C. Thadani, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. B. A. Wilson, Chief, TVA Projects
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

ENCLOSURE

BELLEFONTE POSITION PAPER REGARDING SAFE SHUTDOWN

PURPOSE

This paper describes the safe shutdown condition for design basis events at Bellefonte Nuclear Plant (BLN). This condition will be used in the selection of the equipment required to be evaluated per 10 CFR 50.49 to support safe shutdown of BLN for normal as well as accident conditions. While TVA does not request specific approval of the position discussed below, TVA welcomes any comments the NRC may have on the information provided.

POSITION

The safe shutdown condition (i.e., reactor subcritical with stable pressure and temperature) for loss of coolant accidents (LOCAs) is dictated by the size of the break being analyzed. For each LOCA event analyzed in the BLN Final Safety Analysis Report (FSAR), achieving and maintaining a safe shutdown condition following a LOCA is ensured by meeting the design requirements for the emergency core cooling system (ECCS) as prescribed in 10 CFR 50.46 and 10 CFR 50, Appendix K.

For non-LOCA design basis events and normal operation, the safe shutdown condition for BLN is hot standby which corresponds to a normal post-trip condition (i.e., reactor subcritical with decay heat being removed by the steam generators). The BLN design provides the ability to establish and maintain hot standby by safety-grade means for sufficient time until restoration of off-site power, repairs, or manual actions can be taken to proceed to cold shutdown or other desired plant conditions.

JUSTIFICATION

Requirements for core protection during LOCAs are found in 10 CFR 50.46 and 10 CFR 50, Appendix K. These regulations define the range of break sizes to be considered, provide acceptance criteria for ECCS performance during and after a LOCA, and define the required and acceptable features of an ECCS evaluation model. BLN electrical equipment required to accomplish these requirements will be evaluated in accordance with 10 CFR 50.49.

Hot standby is the stable end condition for other (non-LOCA) design basis events analyzed in the BLN FSAR. BLN electrical equipment required to establish and maintain hot standby by safety-grade means for sufficient time until other measures can be taken will be evaluated in accordance with 10 CFR 50.49. Other measures may include restoration of off-site power, repairs, or manual actions to proceed to cold shutdown or other desired plant condition.

The BLN position is consistent with 10 CFR 50.49 and the statements of consideration published in the Federal Register with the final rule (48 FR 2729, 1/21/83).