



Tennessee Valley Authority
1101 Market Street, LP 3R
Chattanooga, Tennessee 37402-2801

R. M. Krich
Vice President
Nuclear Licensing

October 5, 2011

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Watts Bar Nuclear Plant, Unit 1
Facility Operating License No. NPF-90
NRC Docket No. 50-390

Subject: **Watts Bar Nuclear Plant Unit 1 - Application to Eliminate License Condition 2.G Requiring Reporting of Violations of Section 2.C of Operating License (WBN-TS-11-13)**

In accordance with the provisions of 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," the Tennessee Valley Authority (TVA) requests a change (WBN-TS-11-13) to Watts Bar Nuclear Plant (WBN), Unit 1, Facility Operating License No. NPF-90.

The proposed amendment will delete the license condition that requires reporting of violations of other requirements (e.g., conditions listed in Section 2.C) in the operating license. The change is consistent with the notice published in the "Federal Register" on November 4, 2005 (70 FR 67202) as part of the consolidated line item improvement process (CLIIP).

The Enclosure to this letter provides a description of the proposed change and confirmation of applicability.

TVA requests approval of the proposed license amendment by October 1, 2012, with implementation by November 1, 2012.

The WBN Plant Operations Review Committee and the WBN Nuclear Safety Review Board have reviewed this proposed change and determined that operation of WBN in accordance with the proposed change will not endanger the health and safety of the public.

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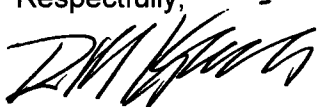
U.S. Nuclear Regulatory Commission
Page 2
October 5, 2011

Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and Enclosure to the Tennessee Department of Environment and Conservation.

There are no regulatory commitments associated with this submittal. Please address any questions regarding this request to Joe Shea, Corporate Licensing Manager, at 423-751-6887.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 5th day of October 2011.

Respectfully,



R. M. Krich

Enclosure:
Evaluation of Proposed Change

cc (Enclosure):

NRC Regional Administrator - Region II
NRC Resident Inspector - Watts Bar Nuclear Plant, Unit 1
NRC Resident Inspector - Watts Bar Nuclear Plant, Unit 2
Director, Division of Radiological Health - Tennessee State Department of
Environment and Conservation

ENCLOSURE

**TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT
UNIT 1**

EVALUATION OF PROPOSED CHANGE

Subject: Application to Eliminate License Condition 2.G Requiring Reporting of Violations of Section 2.C of Operating License (WBN-TS-11-13)

- 1.0 INTRODUCTION
- 2.0 DESCRIPTION OF PROPOSED AMENDMENT
- 3.0 BACKGROUND
- 4.0 REGULATORY REQUIREMENTS AND GUIDANCE
- 5.0 TECHNICAL ANALYSIS
- 6.0 REGULATORY ANALYSIS
- 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION
- 8.0 ENVIRONMENTAL EVALUATION
- 9.0 PRECEDENT
- 10.0 REFERENCES

ATTACHMENTS

- 1. Proposed Operating License Changes (Mark-Ups) for WBN, Unit 1
- 2. Proposed Operating License Changes (Final Typed) for WBN, Unit 1

1.0 INTRODUCTION

The proposed amendment would delete Section 2.G of Facility Operating License No. NPF-90 for Watts Bar Nuclear Plant (WBN), Unit 1, which requires reporting of violations of the requirements in Section 2.C of the facility operating license. The availability of this operating license improvement was announced in the *Federal Register* on November 4, 2005 as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the CLIIP Notice of Availability (70 FR 67202), the proposed amendment consists of deleting Section 2.G of Facility Operating License No. NPF-90. The current requirements of the license condition are as follows:

- 2.G Except as otherwise provided in the Technical Specifications (Appendix A to this license) or Environmental Protection Plan (Appendix B to this license), TVA shall report any violations of the requirements contained in Section 2.C of this license in the following manner: initial notification shall be made within twenty-four (24) hours to the NRC Operations Center via the Emergency Notification System with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73 (b), (c), and (e).

The existing conditions in Section 2.C that are subject to the current report requirement consist of the following:

- 2.C This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and is subject to the additional conditions specified or incorporated below.

(1) Maximum Power Level

TVA is authorized to operate the facility at reactor core power levels not in excess of 3459 megawatts thermal.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A as revised through Amendment No. 86 and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. TVA shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Safety Parameter Display System (SPDS) (Section 18.2 of SER Supplements 5 and 15)

Prior to startup following the first refueling outage, TVA shall accomplish the necessary activities, provide acceptable responses, and implement all proposed corrective actions related to having the Watts Bar Unit 1 SPDS operational.

(4) Vehicle Bomb Control Program (Section 13.6.9 of SSER 20)

During the period of the exemption granted in paragraph 2.D.(3) of this license, in implementing the power ascension phase of the approved initial test program, TVA shall not exceed 50% power until the requirements of 10 CFR 73.55(c)(7) and (8) are fully implemented. TVA shall submit a letter under oath or affirmation when the requirements of 73.55(c)(7) and (8) have been fully implemented.

(5) Reactor Vessel Fracture Toughness Testing

Supplemental fracture toughness testing (J-R) will be performed in accordance with a testing procedure that has been previously reviewed and approved by the NRC staff on Surveillance Capsule W specimens (removed from Cycle 3 Refueling Outage) and Capsule X specimens (to be removed from Cycle 5 Refueling Outage). The supplemental test results will be included in the report to be submitted in accordance with 10 CFR 50, Appendix H requirements for each Capsule specimen and will include an evaluation of the effects on TVA's equivalent margins analysis which was submitted October 15, 1993 and approved by NRC in Supplemental Safety Evaluation Report (SSER) 14.

(6) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - 5. Training of response personnel

- (b) Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy
 - 5. Identification of readily-available pre-staged equipment
 - 6. Training on integrated fire response strategy
 - 7. Spent fuel pool mitigation measures

- (c) Actions to minimize release to include consideration of:
 - 1. Water spray scrubbing
 - 2. Dose to onsite responders

- (7) The licensee shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

- (8) Upon implementation of Amendment No. 70 adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.7.2.20.c.(i), the assessment of CRE habitability as required by Specification 5.7.2.20.c.(ii), and the measurement of CRE pressure as required by Specification 5.7.2.20.d, shall be considered met following implementation:
- (a) The first performance of SR 3.7.10.4, in accordance with Specification 5.7.2.20.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from April 5, 2004, the date of the most recent successful tracer gas test, as stated in the August 4, 2004, letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
 - (b) The first performance of the periodic assessment of CRE habitability, Specification 5.7.2.20.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from April 5, 2004, the date of the most recent successful tracer gas test, as stated in the August 4, 2004 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
 - (c) The first performance of the periodic measurement of CRE pressure, Specification 5.7.2.20.d, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from May 10, 2007, the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on November 4, 2005 (70 FR 67202) and the Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on November 4, 2005 (70 FR 67202) and the Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

5.0 TECHNICAL ANALYSIS

TVA has reviewed the safety evaluation (SE) published on August 29, 2005, as part of the CLIP Notice of Opportunity to Comment. TVA has concluded that the justifications presented in the SE prepared by the NRC staff are applicable to WBN, Unit 1 and justify this amendment of the facility operating license for WBN, Unit 1.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Opportunity to Comment published on August 29, 2005 (70 FR 51098).

7.0 NO SIGNIFIGANT HAZARDS CONSIDERATION

TVA has reviewed the proposed no significant hazards consideration determination published on August 29, 2005 (70 FR 51098), as part of the CLIIP Notice of Opportunity to Comment. TVA has concluded that the proposed determination presented in the notice is applicable to WBN, Unit 1 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

TVA has reviewed the environmental evaluation included in the model SE published on August 29, 2005 (70 FR 51098), as part of the CLIIP Notice of Opportunity to Comment. TVA has concluded that the NRC staff's findings presented in that evaluation are applicable to WBN, Unit 1 application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. TVA is not proposing variations or deviations from the changes described in the NRC staff's model SE published on August 29, 2005 (70 FR 51098).

10.0 REFERENCES

1. *Federal Register* Notice of Opportunity to Comment on Model Safety Evaluation on Elimination of Typical License Condition Requiring Reporting of Violations of Section 2.C of Operating License Using the Consolidated Line Item Improvement Process, August 29, 2005 (70 FR 51098).
2. *Federal Register* Notice of Availability of Model Application Concerning Elimination of Typical License Condition Requiring Reporting of Violations of Section 2.C of Operating License Using the Consolidated Line Item Improvement Process, November 4, 2005 (70 FR 67202)

ATTACHMENT 1

Proposed Operating License Changes (Mark-Ups) for WBN, Unit 1

Deleted.

- G. ~~Except as otherwise provided in the Technical Specifications (Appendix A to this license) or Environmental Protection Plan (Appendix B to this license), TVA shall report any violations of the requirements contained in Section 2.C of this license in the following manner: initial notification shall be made within twenty-four (24) hours to the NRC Operations Center via the Emergency Notification System with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73 (b), (c), and (e).~~
- H. The licensee shall have and maintain financial protection of such types and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

Revised by letter dated August 9, 2007

and Amendment No.

ATTACHMENT 2

Proposed Operating License Changes (Final Typed) for WBN, Unit 1

- G. Deleted.
- H. The licensee shall have and maintain financial protection of such types and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.