



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

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

Watts Bar Nuclear Plant, Unit 2
Facility Construction Permit No. CPPR-92
NRC Docket No. 50-391

Subject: **Watts Bar Nuclear Plant Unit 2 - Response To Questions Regarding
The Unit 1/Unit 2 As-Constructed Fire Protection Report
(TAC No. ME3091)**

- References:
1. Letter from TVA to NRC, "Watts Bar Nuclear Plant (WBN) Unit 2 - Transmittal of Unit 1/Unit 2 As-Constructed Fire Protection Report (TAC No. ME3091)," dated September 18, 2014
 2. Email from J. Poole (NRC) to G. Arent (TVA), "Discussion topics for meeting with TVA," dated October 7, 2014
 3. Email from J. Poole (NRC) to G. Arent (TVA), "Additional clarifications for FPR," dated October 15, 2014

By letter dated September 18, 2014 (Reference 1), the Tennessee Valley Authority (TVA) submitted the Watts Bar Nuclear Plant (WBN) Unit 1/Unit 2 As-Constructed Fire Protection Report (FPR). Enclosure 1 of the submittal contained updated versions of the WBN Unit 1/Unit 2 FPR, Parts I through X. A public meeting with NRC staff and TVA representatives was held on October 8, 2014, to discuss several topics related to the WBN Unit 1/Unit 2 FPR submittal. Prior to the public meeting, the NRC sent an email to the TVA containing a list of topics to be discussed during the meeting (Reference 2). During the public meeting, the NRC requested clarifications related to the Reference 1 submittal. On October 15, 2014, the NRC sent an email to the TVA with an additional set of requested clarifications (Reference 3).


Enclosure 1 provides the proposed action that the TVA intends to take to address each of the topics discussed during the October 8, 2014 public meeting, as well as the clarifications the NRC requested in Reference 2 and Reference 3. In addition, the TVA identified several changes that need to be made to the FPR. A summary is provided in Enclosure 1 for each of the TVA-identified changes. The above changes will be included in the next update of the WBN Unit 1/Unit 2 FPR. It is TVA's intent that the next WBN Unit 1/Unit 2 FPR submittal will supersede the Reference 1 submittal.

The TVA will be meeting with the NRC on October 29, 2014 to further discuss the proposed changes to the WBN Unit 1/Unit 2 FPR prior to its submittal, to ensure the submitted FPR changes adequately address the NRC's concerns.

The new commitments made in this letter are listed in Enclosure 2. Please direct any questions concerning this matter to Gordon Arent at (423) 365-2004.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on the 27th day of October, 2014.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

Enclosures:

1. TVA Proposed Responses to NRC Requested Clarifications Regarding WBN Unit 1/Unit 2 Fire Protection Report
2. New Regulatory Commitments List

Enclosures

cc (Enclosures):

U. S. Nuclear Regulatory Commission, Region II
NRC Resident Inspector Unit 1, Watts Bar Nuclear Plant
NRC Resident Inspector Unit 2, Watts Bar Nuclear Plant

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

By letter dated September 18, 2014 (Reference 1), the Tennessee Valley Authority (TVA) submitted the Watts Bar Nuclear Plant (WBN) Unit 1/Unit 2 As-Constructed Fire Protection Report (FPR). Enclosure 1 of the submittal contained updated versions of the WBN Unit 1/Unit 2 FPR, Parts I through X. A public meeting with Nuclear Regulatory Commission (NRC) staff and TVA representatives was held on October 8, 2014, to discuss several topics related to the WBN Unit 1/Unit 2 FPR submittal. Prior to the public meeting, the NRC sent an email to the TVA containing a list of topics to be discussed during the meeting (Reference 2). During the public meeting, the NRC requested clarifications related to the Reference 1 submittal. On October 15, 2014, the NRC sent an email to the TVA with an additional set of requested clarifications (Reference 3).

Provided below are the actions that the TVA intends to take to address the topics discussed at the October 8, 2014 public meeting, as well as the clarifications the NRC requested in Reference 2 and Reference 3. In addition, the TVA has identified several changes that need to be made to the FPR. A summary for each of the TVA-identified changes is also provided below.

Item 1 (NRC):

[Enclosure 2, item VII-18] FPR Part VII, Section 3.6.

Proposed Action:

This item deals with the inclusion of information related to combustible loading within a room that exceeds the fire rating of the wall. As discussed with the NRC during the public meeting held on October 8, 2014, the TVA will remove Part VII, Section 3.6 from the FPR. This information will be included in a TVA calculation.

Item 2 (NRC):

[Enclosure 2, item VII-23] FPR Part VII, Section 8: Tell us about the Unit 1 OMAs [operator manual actions] added to this section.

Proposed Action:

Three Unit 1 OMAs were added to Part VII, Section 8. As discussed with the NRC during the public meeting held on October 8, 2014, additional reviews of the Unit 1 OMAs have resulted in a change to the TVA's approach to these items. These previously existing OMAs were originally considered discrete Unit 1 OMAs, but had not been reviewed by the NRC. Later discussions determined that part of the items (Part VII, Sections 8.3.4.5 and 8.3.8.5) are sub-actions for a previously NRC-approved OMA (OMA 110). The definition for OMA 110 is being clarified to explicitly include these sub-actions. Because OMAs 1411, 1447, and 1614 are sub-actions for an existing OMA, and the sub-actions are performed at the same location as the primary actions, the TVA considers the NRC approval of OMA 110 in SSER 18 as applicable to this situation.

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Therefore, the NRC approval of the sub-actions is not required, and Part VII, Sections 8.3.4.5 and 8.3.8.5 will be removed from the WBN Unit 1/Unit 2 FPR.

The TVA will remove Part VII, Section 8.3.6.5, from the WBN Unit 1/Unit 2 FPR. Further review has determined that the sub-actions are not required for a fire in room 713.0-A27 (FPR Part VII, Section 8.3.6.5).

Part VII, Sections 8.3.66.3, 8.3.67.3 and 8.3.68.3 evaluate Unit 1 OMAs 1397/1398 and 1598/1599. These new OMAs were intended to replace Unit 1 OMA 612 by doing the same function using an improved process. The dual unit report contains this improved process for both Unit 1 and Unit 2. Based on the discussion on October 8, 2014, the dual unit FPR will be revised to remove Unit 1 OMAs 1397/1398 and 1598/1599 and return Unit 1 to relying upon OMA 612. The TVA will consider requesting approval of OMAs 1397/1398 and 1598/1599 at a later date.

Item 3 (NRC):

[Enclosure 2, item II-9] FPR Part II, Section 8.1.c: It would be best not to refer to the "Appendix R" license condition, but simply to the fire protection license condition, i.e., "...without prior approval of the NRC in accordance with the Fire Protection License Condition in each unit's Operating License."

Proposed Action:

The TVA will revise the statement to refer to the Fire Protection License Condition rather than the Appendix R License Condition.

Item 4 (NRC):

[Enclosure 2, item II-17] FPR Part II, section 12.10.2 discusses the installation of 3M E54C radiant energy shield material in the Unit 2 annulus and some installations in the Unit 1 annulus. However, FPR Part VII, Section 2.2 does not align with this, because it implies the installation of the M-20A material in both annuluses.

Proposed Action:

The second sentence of the "Deviation" sub-section of Part VII, Section 2.2 will be updated to be consistent with Section 12.10.2 of Part II.

Item 5 (NRC):

[Enclosure 2, items III-5 and IV-1] Are the "Distributed Control Systems (DCS) for Non Safety Related Control Systems" considered safe-shutdown cables or equipment and included in the safe shutdown analysis? If not, why is this discussion included in FPR Part III, Section 6.0 and FPR Part IV, Section 3.0? If they are, have they been added to the database (i.e., FPR Part VI)?

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Proposed Action:

This item was discussed with the NRC during the public meeting held on October 8, 2014. The DCS non-safety related cables are included in the as-constructed fire safe shutdown (FSSD) analysis/database that will be issued prior to the resubmittal of the FPR.

In addition, the TVA will provide additional information within Part III, Section 6.0, and Part IV, Section 3.0, regarding capabilities and operation of the DCS.

Item 6 (NRC):

[Enclosure 2, item VI-18] FPR Part VI, Table 6-1: Tell us about the 25 minute OMA that operates control 1/2-XS-68-341H.

Proposed Action:

Based on the discussions with the NRC on October 8, 2014, the TVA understands the NRC concern is whether pressurizer heater C can be turned off from the main control room (MCR), or if additional local actions are required. The MCR switch is spring return to AUTO, thereby allowing the process signal to re-energize the heater. Local action is needed to ensure the heater remains OFF. The other pressurizer heaters do not have a spring return feature. This feature is present on both units. No change to the FPR is required to address this item.

Item 7 (NRC):

[Enclosure 2, item VI-19] Why were FPR Part VI, Tables 6-2 and 6-3 deleted?

Proposed Action:

Table 6-2 was deleted because Unit 1 and Unit 2 have performed modifications to eliminate spurious safety injection and containment isolation signals. Table 6-3 was deleted because the supporting analyses have been revised to allow the use of either the reactor vessel head vents or the pressurizer power operated relief valves. Therefore, the timing requirements in Table 6-3 are no longer needed. No change to the FPR is required to address this item.

Item 8 (NRC):

[Enclosure 2, item VII-10] FPR Part VII, section 3.1.1: Is this one cable, by itself, required for safe shutdown? That is, does the loss of this cable prevent safe shutdown?

Proposed Action:

Based on discussions with NRC on October 8, 2014, the NRC's concern was understood to be whether the cable discussed in the following sentence from the first paragraph of sub-section for Room 692.0-A18, "Hot Tool Room," would prevent FSSD:

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

“The room contains one fire safe shutdown cable. Fire damage will not cause spurious operation or affect safe shutdown.”

Damage to this cable by itself does not adversely affect FSSD. Section 3.1 provides an evaluation of FSSD components in selected rooms where the room does not contain full suppression and detection. For the Hot Tool Room, the evaluation concluded that the cable will not affect fire safe shutdown or cause spurious operations. In order to clarify FPR Part VII, Section 3.1, the title for the column previously labeled “FSSD” will be relabeled to “FSSD Component” because a “yes” answer in the column means the room contains a FSSD component(s) and thus the room requires an evaluation. A “yes” answer does not mean that the fire prevents FSSD.

Proposed FPR Revision:

- a. As a result of the October 8, 2014, public meeting and as a clarification, the last paragraph of Section 3.1 will be updated to read as follows. The bolded and underlined text highlights the changes made after the submittal of Reference 1.

“There are fire areas at WBN that contain FSSD components that either (1) rely on 20 feet of separation or 1-hour fire barriers outside of containment, or (2) rely on detection and suppression capabilities inside containment, but have less than full area detection and suppression capability. Each area is identified below, along with the rooms within the fire area that have less than full detection and suppression system coverage **and whether the room contains FSSD components.** The impact on fire safe shutdown capability is ~~also identified~~ **evaluated for rooms containing FSSD components.**”

- b. As a result of this October 8, 2014, meeting and as a clarification, for the table in Sections 3.1.1, 3.1.2, 3.1.7 and 3.1.9, the labeling of the FSSD column will be changed to FSSD Component.
- c. As a result of the October 8, 2014, meeting, the Sub-section labeled “Room 692.0-A18: Hot Tool Room” of Section 3.1.1 will be updated as follows. The bolded and underlined text highlights the changes made after the submittal of Reference 1.

“The room is provided with fire detection and automatic suppression, but suppression has not been extended into the entrance labyrinth of the room. The room ~~does not contain a single path of fire~~ **contains one fire safe shutdown cable safe shutdown equipment or cabling.** **Fire damage will not cause spurious operation or affect safe shutdown.**”

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Item 9 (NRC):

[Enclosure 2, item VII-12] FPR Part VII, section 3.1.7: The changed paragraph is now contradictory because it still says "Based on the lack of safe shutdown equipment and cables combined with the low fire loading in all of the rooms an adequate level of protection is currently provided" and TVA has now identified SSD [safe shutdown] cables in these rooms.

Proposed Action:

The TVA agrees the wording should be revised to clarify the intent of the previous change made in the Reference 1 submittal. The first sentence below previous began with the phrase "Each room has." The proposed change will reword two sentences in the second paragraph to read as follows:

"Rooms 737.0-A4 and 737.0-A11 have a combustible loading that results in an equivalent fire severity of less than ten minutes. Room 737.0-A2 has a fire severity of less than 20 minutes."

Item 10 (NRC):

[Enclosure 2, item VIII-10] FPR Part VIII, section F.2: Tell us about the 1 hour (minimum) rated fire barriers that used to separate the MCR from the adjacent rooms on the same elevation of the control building.

Proposed Action:

Based on discussions with the NRC on October 8, 2014, the NRC's concern was understood to be the need for an explanation of why the description of the walls in the control building were removed. The TVA will restore the wording that was deleted in FPR Part VIII, Section F.2. In addition, information regarding Doors C55 and C56 will be added to the Remarks column of Section F.2.

Item 11 (NRC):

FPR Part VII, Section 8.3.7: This section appears to be new and not reflected in Enclosure 2.

Proposed Action:

Part VII, Section 8.3.7, contains information related to OMA 1023. Even though the as-designed analysis for the as-designed FPR, did not include this OMA, the As-Constructed Unit 2 analysis shows that the OMA is needed for a Unit 2 Annulus fire. The addition of this item is addressed by Part VII, Item 28, Sub-item 1 of Enclosure 2 of the Reference 1 submittal. No change to the FPR is required to address this item.

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Item 12 (NRC):

FPR Part V, Sections 2.1 and 2.1.2: Why did TVA add the reference to WCAP-16755 and add the 80% criteria for the Unit 1 OMAs. This represents a change to the NRC review. Additionally, Section 2.1.2 says that if an OMA is performed with 80% of the allowed time that it is a 20% margin. Using the method which is used to calculate 50% margin, the answer should be that completing an action with 80% of the allowed time is a 25% margin.

Proposed Action:

The TVA will delete the reference to WCAP-16755 and revise the wording to refer to the criteria from NRC Supplemental Safety Evaluation Report (SSER) 18, Section 3.5.

Item 13 (NRC):

FPR Part VII, Section 8.4.1.1: This section states that no credible fire could cause the need for OMAs, but it continues to evaluate the OMAs. Please explain.

Proposed Action:

This section will be revised to clarify that the OMA is required and the section is included because re-entry into the room of fire origin would be necessary. Therefore, the OMA is evaluated for feasibility and reliability.

Item 14 (NRC):

FPR Part VII, Section 8.3.6.2: The use of the word "or" in the first sentence appears to be wrong. Please explain.

Proposed Action:

The sentence will be revised to read "...provided with detection and suppression..."

Item 15 (NRC):

FPR Part VII, Sections 8.3.23.4, 8.3.24.3, 8.3.24.4 and 8.4.2.3.b: These sections are different from the corresponding sections for other rooms in that they do not summarize the available margin.

Proposed Action:

Sections 8.3.23.4, 8.3.24.3, 8.3.24.4 will be revised to include a summary of the time margin. Section 8.4.2.3.b will be revised to include wording similar to Section 8.4.1.3.b. The TVA also determined that the name of the room in Part VII, Section 8.3.23.4.b was not deleted in the same manner as was done for other sections in the Reference 1 submittal. The room name in Section 8.3.23.4.b will be deleted.

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Item 16 (NRC):

Enclosure 2, Fire Protection Report (FPR) Sections Updated for Part V, includes item 10, which relates to Part V, Section 4.1, which clarifies that the “blackout” testing was only performed for Unit 1. What is the basis for the adequacy of emergency lighting locations and illuminations levels for Unit 2 emergency lights?

Proposed Action:

Based on discussions with NRC on October 8, 2014, the NRC’s concern was whether the Unit 2 emergency lights will be verified under blackout conditions. The Unit 1 lighting tests, including the major transit paths, were conducted by blacking out large sections of the plant. Due to the potential impact on Unit 1 operation, the Unit 2 emergency lighting will be tested with localized blackouts. The localized blackout test conditions will be controlled to ensure the nearby lights do not influence the results of the tests. No change to the FPR is required to address this item.

Item 17 (NRC):

Part VII – Section 8.2.h, states:

“As described above, procedure 0-AOI-30.2 documents the locations and sequence that operator manual actions must be performed. Necessary protective equipment is addressed in these procedures. Per general employee training descriptions, WBN Auxiliary Unit Operators (AUOs) and others who are expected to use an SCBA [self-contained breathing apparatus] are trained annually in the proper use of an SCBA. This Personnel Protection Equipment (PPE) is readily available and is picked up as the AUOs report to the MCR for their assignments.”

It would seem that operators won’t necessarily know they need SCBA until after they arrive at the MCR. Please clarify how this is handled.

Proposed Action:

Procedure AOI-30.1, “Plant Fires,” provides the following directions for the main control room to recall the AUOs in the event of a potential Appendix R fire:

“**THEN NOTIFY ALL AUOs** to report with gear and Standby for AOI-30.2.”

The “with gear” includes the SCBA. The TVA has initiated a correction action item to revise the procedural guidance to include a list of PPE for AUOs responding to a fire. No change to the FPR is required to address this item.

Item 18 (TVA):

Update to Part II to define testing requirements for 2-FCV-63-39-A and 2-FCV-63-40-B.

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Proposed Action:

Part II of the FPR will be revised (as shown below) to add the two Unit 2 valves to Part II, Testing and Inspection Requirements (TIR) matrix and Bases to ensure they are stroked periodically as shown below. Table 14.10 will be updated, and B.14.10.s will be added as shown below.

ITEM NO.	TYPE OF SYSTEM/COMPONENT	FREQUENCY	TESTING/INSPECTION REQUIREMENT (TIR)	NOTES
14.10.s	Unit 2 Safety Injection System Boron Injection Tank Inlet Shutoff Valves: (2-FCV-63-39-A, 2-FCV-63-40-B) (Refer to Table 14.10)	18 months	Verify capability to close 2-FCV-63-39-A and 2-FCV-63-40-B using the associated hand switch on Control/Auxiliary Building (C&A) Vent boards.	

“B.14.10.s TIR [Testing and Inspection Requirements] 14.10.s verifies every 18 months that the Unit 2 Safety Injection System Boron Injection Tank Inlet Shutoff Valves (2-FCV-63-39-A, 2-FCV-63-40-B) are capable of being closed from a hand switch on a Control and Auxiliary Building (C&A) Vent board. This verifies that each valve operates properly and can be closed if required to support fire safe shutdown. The valves are tested every 18 months when the unit is shutdown.”

Item 19 (TVA):

Correction to Part II, TIR 14.10.c.

Proposed Action:

As part of Reference 1 submittal of the as-constructed FPR, the following change was made to the Bases for TIR 14.10.c:

“B.14.10.c TIR 14.10.c verifies every 18 months that main steam system valves are capable of being closed via Main Control Room switch ~~or locally by manual operation of the valve...~~”

A similar statement was also included in TIR 14.10.c but was not removed as part of the Reference 1 submittal.

The above issue will be corrected by making the following change to TIR 14.10.c:

“Verify capability to close valves using the associated hand switch in the Main Control Room ~~or manually at the valve.~~”

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Item 20 (TVA):

Update of Part III Section 4.7, "Component Cooling System (CCS) - Key 1B":

Proposed Action:

Part III, Section 4.7 currently contains a listing (see below) of the component cooling system loads serviced for fire safe shutdown. A recent review has determined that the listing incorrectly characterizes the loads associated with the centrifugal charging pumps and includes a load that is not required for fire safe shutdown. Under the entry for centrifugal charging pumps, the document lists (shown in **bold**) some loads that are actually part of the residual heat removal system pumps. Additionally, the list includes the spent fuel pool cooling system heat exchangers (shown in bold/italics). While this heat load will be present, it is not a heat load that is required to be cooled for fire safe shutdown.

Current wording:

"The CCS system provides cooling for the following safe shutdown equipment:

- (1) Residual heat removal exchangers
- (2) Centrifugal charging pumps
 - (a) **Mechanical-seal heat exchangers**
 - (b) Gear oil coolers
 - (c) Bearing oil coolers
 - (d) **Seal housing**
- (3) Residual heat removal pumps mechanical-seal heat exchangers
- (4) Reactor coolant pump thermal barrier heat exchanger (Train A only)
- (5) ***Spent fuel pool cooling system heat exchanger (Train A only)***
- (6) Chemical volume control system seal water heat exchanger (Train A only)"

Proposed FPR Change:

The centrifugal charging pumps do not have mechanical seal heat exchangers or seal housing heat exchangers. In order to correct the description and make it better reflect the actual configuration of the plant required to support fire safe shutdown, the section will be revised as follows. The bolded and underlined text highlights the changes made after the submittal of Reference 1.

"The CCS system provides cooling for the following safe shutdown equipment:

- (1) Centrifugal charging pumps**
- (2) Residual heat removal heat exchangers**
- (3) Residual heat removal pumps**
- (4) Reactor coolant pump thermal barrier coolers (CCS Train A only)**
- (5) Chemical volume control system seal water heat exchanger (CCS Train A only)**

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

In addition to cooling the above listed fire safe shutdown equipment, the spent fuel pool cooling heat exchangers non-fire safe shutdown cooling load may also be cooled by Train A of the component cooling system."

Item 21 (TVA):

Update made to Part VI, Table 6-1, "Local Operator Manual Actions and Main Control Room Operator Actions for all AVs:"

Proposed Action:

The TVA is in the process of finalizing Calculation EDQ00099920090016, "Appendix R – Units 1 and 2 Manual Actions Requirements." As part of this process, updates were made to Appendix G, "Main Control Room and Local Operator Manual Actions for all Analyses," of the calculation. The changes to Appendix G resulted in the changes to Table 6-1 discussed below.

Proposed FPR Revision:

For the following components listed in Part VI, Table 6-1, a reference to Note 1 of Table 6-1 will be added. Note that bolded and underlined text was not used in the tables below:

End Device	Function Performed	Control Operated⁵	When Required (Minutes)
1/2-BKR-99-L116/1B-A ¹	TRIP	1/2-RT-1 (MCR)	0
1/2-LCV-62-135-A ¹	OPEN	1/2-HS-62-135A-A (MCR)	15
1/2-FCV-62-90-A ¹	CLOSE	1/2-HS-62-90A-A (MCR)	35
1/2-PCV-68-340A-A ^{1,2}	OPEN/CLOSE	1/2-HS-68-340AA-A (MCR)	60

The following components, with a reference to Note 1, will added to Table 6-1:

End Device	Function Performed	Control Operated⁵	When Required (Minutes)
1/2-LCV-62-132-A ¹	Close	1/2-HS-62-132A-A	70
1/2-MTR-30-74-A ¹	Operable	1/2-HS-30-74A-A	120
1/2-MTR-30-77-A ¹	Operable	1/2-HS-30-77A-A	120
1/2-MTR-30-83-A ¹	Operable	1/2-HS-30-83A-A	120
1/2-MTR-30-88-A ¹	Operable	1/2-HS-30-88A-A	120

Enclosure 1
TVA Proposed Responses to NRC Requested Clarifications
Regarding WBN Unit 1/Unit 2 Fire Protection Report

Item 22 (TVA):

References in Part VII to the Motor Driven Auxiliary Feedwater (MDAFW) pump or the Turbine Driven Auxiliary Feedwater (TDAFW) pump.

Proposed Action:

References in Part VII to the MDAFW pump or the TDAFW pump are being removed. This action will be taken to eliminate contradictory statements between the text in Part VII and the Analysis Volume tables in Part VI.

Proposed FPR Revision:

In order to prevent contradictory statements between the narratives and the tables, the following phrases are being removed from Sections 8.3.6.3, 8.3.6.4, 8.3.10.3, 8.3.21.3, 8.3.25.3, 8.3.25.4, 8.3.29.4, 8.3.36.3, 8.3.36.4, 8.3.37.3, 8.3.37.4, 8.3.39.3, 8.3.55.3, 8.3.56.3, 8.3.57.3, 8.3.58.3, 8.3.59.3, 8.3.60.3, 8.3.61.3, 8.3.62, 8.3.63, 8.3.64 and 8.3.65, as applicable:

1. if MDAFW Pump A or TDAFW Pump is used
2. if MDAFW Pump B or TDAFW Pump is used
3. if MDAFW Pump B is used
4. This action is required for safe shutdown when using either MDAFW Pump A or the TDAFW Pump.
5. if Motor Driven AFW Pump A or Turbine Driven AFW Pump is used

Item 23 (TVA):

Correction to Part VII, Section 8.3.64, "Bounding Evaluation for OMA 1023 – Operate Steam Generator Relief Valves to Control Secondary Pressure."

Proposed Action:

The first sentence of the second paragraph of Section 8.3.64 will be revised to read as follows:

"This OMA is performed for a fire in the rooms listed above located on elevations 713.0' thru 782.0' of the Auxiliary Building, **the Reactor Building** and the Intake Pumping Station."

References:

1. Letter from J. W. Shea (TVA) to Document Control Desk (NRC), "Watts Bar Nuclear Plant (WBN) Unit 2 - Transmittal of Unit 1/Unit 2 As-Constructed Fire Protection Report (TAC No. ME3091)," dated September 18, 2014
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Enclosure 2
New Regulatory Commitments List

1. The changes will be included in the next update of the Watts Bar Nuclear Plant Unit 1/Unit 2 Fire Protection Report.
2. Unit 2 emergency lighting will be tested with localized blackouts that will be controlled to ensure nearby lights do not influence the results of the test.