



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

CNL-17-093

July 21, 2017

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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

Watts Bar Nuclear Plant, Unit 2  
Facility Operating License No. NPF-96  
NRC Docket No. 50-391

Subject: **Revised Response to Request for Additional Information Related to License Amendment Request To Revise Technical Specification 3.7.12, Auxiliary Building Gas Treatment System (ABGTS), for Watts Bar Nuclear Plant, Units 1 and 2 (CAC Nos. MF8526 and MF8527)**

Reference:

1. TVA Letter to NRC, CNL-16-141, "Application to Modify Watts Bar Nuclear Plant Units 1 and 2 Technical Specifications Regarding Intermittent Opening of the Auxiliary Building Secondary Containment Closure Technical Specification 3.7.12, 'Auxiliary Building Gas Treatment System' (WBN-TS-16-19)," dated October 20, 2016 (ML16294A551)
2. NRC Electronic Mail to TVA, "Watts Bar, Units 1 and 2 - Final Request for Additional Information Concerning Request to Amend ABGTS TS (CAC Nos. MF8526 and MF8527)," dated March 16, 2017
3. TVA Letter to NRC, CNL-17-044, "Response to Request for Additional Information Related to License Amendment Request To Revise Technical Specification 3.7.12, Auxiliary Building Gas Treatment System (ABGTS), for Watts Bar Nuclear Plant, Units 1 and 2 (CAC Nos. MF8526 and MF8527)," dated May 5, 2017 (ML17125A244)

In Reference 1, Tennessee Valley Authority (TVA) submitted a request for an amendment to the Watts Bar Nuclear Plant (WBN) Unit 1 and Unit 2 Technical Specifications (TS) to revise TS 3.7.12, "Auxiliary Building Gas Treatment System (ABGTS)," to provide an action when both trains of the ABGTS are inoperable due to the auxiliary building secondary containment

enclosure (ABSCE) boundary being inoperable. The proposed license amendment request (LAR) also adds a Note to the TS Limiting Condition for Operation (LCO) that allows the ABSCE boundary to be opened intermittently under administrative controls, consistent with NUREG-1431, "Standard Technical Specifications – Westinghouse Plants." In Reference 2, the Nuclear Regulatory Commission (NRC) transmitted a request for additional information (RAI). In Reference 3, TVA submitted a response to the RAI.

In Reference 3, page E1-8, item 2, in response to NRC SPBP-RAI 1, TVA stated "The steam generator replacement activity for WBN Unit 2 (as noted in the referenced letter this activity is tentatively scheduled during RFO 4 in 2022, but could occur as early as 2019 during RFO 2) will require a single breach manned for approximately one to two months. However, the breach (e.g., a roll-up door) will only be opened when needed to move equipment or personnel into the area."

TVA would like to clarify the above RAI response regarding the planned breach entries of the ABSCE boundary for the steam generator replacement project (SGRP) for WBN Unit 2. The SGRP currently plans to have three breaches greater than the total allowable breach area for the ABSCE (i.e., upper and lower containment access through the air locks and the fabric door leading through penetration X-1). Administrative controls for these breaches will be established in accordance with TVA procedure TI-65, "Breaching the Containment Annulus, ABSCE, or MCRHZ Pressure Boundaries" (see item 1 on pages E1-4 and E1-5 of Reference 3), including having individuals stationed at these breaches in contact with the main control room (MCR). Furthermore, in accordance with TI-65, the breach opening closures would be accomplished within two minutes following notification from the MCR to ensure that the ABSCE boundary could be drawn down to the design parameters within four minutes.

As noted in References 1 and 3, the proposed LAR was intended to support normal operation, short duration events (e.g., door openings, fire damper testing and inspections, and damper strokes). However, for the SGRP activity and on a one-time basis, the breaches are planned to remain in the open position. TVA acknowledges that allowing the breach openings of the ABSCE on a continuous basis during the SGRP does not meet the intent of the proposed Note to TS 3.7.12 in Reference 3 that states "The Auxiliary Building Secondary Containment Enclosure (ABSCE) boundary may be opened intermittently under administrative control that ensure the ABSCE can be closed consistent with the safety analysis."

Therefore, TVA plans to submit a separate LAR to support the SGRP to modify the proposed Note to TS 3.7.12 to allow a one-time exception for the ABSCE breaches to be opened continuously that are needed to support the SGRP, as described in the above paragraph. The LAR will include additional information about the breaches planned for the SGRP.

TVA requests that NRC continue with the approval of the LAR, as proposed in References 1 and 3, on schedule in order to support the upcoming WBN Unit 2 refueling outage in October 2017.

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This revised RAI response does not change the no significant hazards considerations determination contained in Reference 1. There are no new regulatory commitments associated with this submittal. Please address any questions regarding this response to Ed Schrull at 423-751-3850.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 21st day of July 2017.

Respectfully,



J. W. Shea  
Vice President, Nuclear Regulatory Affairs and Support Services

cc:

NRC Regional Administrator - Region II  
NRC Senior Resident Inspector - Watts Bar Nuclear Plant  
NRR Project Manager - Watts Bar Nuclear Plant