

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

November 19, 1979

DOCKET NUMBER
PROPOSED RULE PR - Misc. Notice
Reg. Guide

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir:

In accordance with provisions for public review and comment indicated in the Federal Register on January 17, 1979, the Tennessee Valley Authority (TVA) is pleased to provide the enclosed comments on the following draft regulatory guide:

Task RS 050-2 - "Qualification Tests of Electric Cables and Field Splices for Light-Water-Cooled Nuclear Power Plants"

Since the content and interpretation of regulatory guides have a large impact on TVA's extensive nuclear commitment, we welcome the opportunity for review and comment. TVA comments on additional regulatory guides will be forthcoming as a part of a continuing program.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

cc (Enclosure):

Executive Secretary
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
1717 H Street, NW
Washington, DC 20555

Mr. Fred Stetson
AIF, Inc.
7101 Wisconsin Avenue
Washington, DC 20555

Acknowledged by card... *11/30/79*...

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ENCLOSURE

Tennessee Valley Authority's Comment on
Task RS 050-2 - "Qualification Tests of
Electric Cables and Field Splices for
Light-Water-Cooled Nuclear Power Plants"

1. Page 5, Section C.5, first paragraph - We believe that synergistic effects should not be discussed on an individual basis but should be investigated on a generic basis by some organization such as EPRI or DOE. Also, the temperature data point of 136°C is satisfactory for cable rate at 90°C, but a higher data point is required for cable rated at 125°C.
2. Page 6, Section C.6 - Regulatory Guide 1.89 refers to Regulatory Guide 1.7 for the radiological source term; therefore, we believe the reference should be Table 1 of Regulatory Guide 1.7. We object to this hypothetical term in that it is prohibitively high and apparently based on the failure of all emergency core-cooling trains of equipment (i.e., 100 percent failed fuel). Also, we believe it is unreasonable to expect each manufacturer to have the equipment required to provide a dose rate equivalent to 40 years of plant life plus a LOCA within a reasonable time frame.
3. Page 6, Section 7, second sentence - To make this sentence consistent with the first sentence of this section, the word "type" should be added before "testing" to have the sentence begin, "Additional type testing . . ."

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