TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

July 18, 1980

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Light Water Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Schwencer:

In the Matter of the Application of ) Docket Nos. 50-327
Tennessee Valley Authority ) 50-328

References:
1. Letter from D. G. Eisenhut to All Operating Reactor Licensees dated May 7, 1980
2. Letter from D. G. Eisenhut to All Operating Reactor Licensees dated June 9, 1980
3. Letter from H. R. Denton to All Power Reactor Applicants and Licensees dated March 28, 1980

In the letter dated May 7, 1980, TVA was requested to provide a commitment to meet the requirements and associated schedules in five specific areas. These include shift manning, licensing examinations, licensee dissemination of operating experience, LOFW and small break LOCA generic matters, and control room habitability. Enclosed for your review are TVA's responses to each item. This response addresses the revised action list for Westinghouse-type plants as provided by reference 2.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosures (41)

Item II.K.3.3 - Reporting SRV and PORV Failures and Challenges

Response - We will revise administrative procedures to require reporting promptly any failures to close of a pressurizer safety or PORV valve, or a a steam geneator safety or atmospheric relief valve.

In addition, administrative procedures will be revised to document in the annual report all challenges to these valves.

Item II.K.3.5 - Automatic RCP Trip

Response - TVA supports the position taken by the Westinghouse owners group. The owners group analysis of delayed RCP trip during small break LOCA's is documented in WCAP-9584. This WCAP is the basis for the Westinghouse and owners group position on RCP trip (i.e., automatic RCP trip is not necessary for a Westinghouse PWR since sufficient time is available for manual tripping of the RCP's). This philosophy has been incorporated in the Westinghouse Emergency Operating Instructions which were reviewed and approved by the NRC Bulletins and Orders Task Force and subsequently incorporated in the Sequoyah Emergency Operating Procedures. In addition, the Westinghouse criteria (basically an RCS pressure below the shutoff head of SI pumps) provides for continued RCP operation and therefore forced circulation and decreased reliance on operator action for non-LOCA events. As requested by the NRC in a letter dated April 15, 1980, and as discussed with the NRC during the May 22, 1980, meeting on this subject, we anticipate that the Westinghouse owners group will provide predictions of the loft test L3-6. The NRC has indicated that small break tests at the semiscale and loft facilities as well as owners group test predictions will aid in NRC resolution of this issue. Therefore, we believe that it is not appropriate to take any additional actions on this issue until the results of the NRC sponsored testing (in particular L3-5 and L3-6) and owners group predictions are completed and the results evaluated.

Item II.K.3.9 - PID Controller Modification

The modification has already been made to the Sequoyah PORV controller.

Item II.K.3.10 - Anticipatory Trip Modification

TVA has not proposed to modify the anticipatory trip interlock. Therfore, no action is required.

Item II.K.3.12 - Anticipatory Trip on Turbine Trip

Response - Sequoyah is presently equipped with a reactor trip for a turbine trip from above 10-percent power.

Item II.K.3.17 - ECCS Cumulative Outage Report

Response - Since the Sequoyah plant has not begun power operation, no appreciable data exists.

Item II.K.3.30 - Revised Small Break LOCA Methods to Show Compliance with 10 CFR 50, Appendix F

Response - The present Westinghouse small break evaluation model and small break LOCA analyses for Sequoyah are in conformance with 10 CFR 50, Appendix K and 10 CFR 50.46. Westinghouse has stated that Westinghouse will address the specific NRC items contained in NUREG-0611 in a model change scheduled for completion by January 1, 1982.

Item II.K.3.31 - Plant Specific Calculations

Response - The present Westinghouse small break evaluation model and small break LOCA analyses for Sequoyah are in conformance with 10 CFR 50, Appendix K and 10 CFR 50.56. As stated in the response to item II.K.3.30, Westinghouse plans to submit a new small break evaluation model to the NRC for review by January 1, 1982.

If the results of this new Westinghouse model (and subsequent NRC review and approval) indicate that the present small break LOCA analysis for Sequoyah is not in conformance with 10 CFR 50.46, a new analysis utilizing the new and approved Westinghouse model will be submitted to the NRC in accordance with the NRC schedule.

Item II.D.3.4 - Control Room Habitability

Response - TVA meets at least the intent of the referenced Regulatory Guides and Standard Review Plan sections. The detailed review will be completed and submitted to the NRC by January 1, 1981. Any modifications that are deemed necessary will be discussed at that time.