TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

April 8, 1981

Director of Licensing
Attention: Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch No. 2
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Ippolito:

In the Matter of the	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
		50-296

Your letter to H. G. Parris dated December 2, 1980, requested TVA cooperation and assistance in comparing RETRAN results with simulator results for loss of feedwater and loss of load transients in a BWR. We have evaluated this request and we regret that we cannot assist in this effort for the following reasons.

1. Our first priority at the Power Operations Training Center is to use all available resources to increase the number of licensed employees to those required by NUREG-0737; therefore, all available simulator time and employees are directed to this effort.

2. The engineering staff at the training center has a full-time effort in keeping the simulators current with the plants and in scoping simulator model changes needed to satisfy expanding NRC training program requirements. An attempt to expand the scope of this effort could force a potentially serious manpower drain on the training center.

3. The training simulators were not designed for the provision of engineering prediction. These simulators provide real time tracking of FSAR-type transients and emphasize quantities the operator can observe and especially the effects of his actions on the transient.

4. Our RETRAN models have been constructed primarily for examination of margin to fuel thermal limits and related technical specification quantities. These margins are generally at a minimum in the first few seconds of a transient, well before operator actions can occur. Our RETRAN decks do not contain all the system modeling which might be required for examination of long-term transients.

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Additionally, the composition of a RETRAN deck depends strongly on what quantities and timeframe one is interested in. It simply is not possible to use a model which has both very accurate modeling of the reactor core for severe short-term transients and accurate representations of all systems required to model any long-term event.

We regret that we are unable to provide NRC with assistance in this matter. We will continue to make every effort to be responsive to future NRC requests for assistance.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Subscribed and sworn to before
me this 8th day of April 1981.

Paulette H. White
Notary Public

My Commission Expires 9-5-84

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