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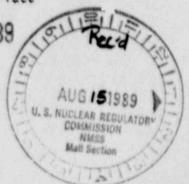
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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

AUG 11 1989



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

Gentlemen:

In the Matter of the Tennessee Valley Authority

DOCKETED

USNRC

AUG 15 1989

NMSS MAIL SECTION DOCKET CLERK

> Docket Nos. 70-2917 70-2941

BELLEFONTE NUCLEAR PLANT (BLN) - REQUEST FOR AN EXEMPTION FROM 10 CFR 70.51(d)

References: 1. TVA letter dated June 13, 1989, "Request for an exemption from 10 CFR 70.51 (d)"

 Bellefonte Nuclear Plant Fuel Storage Physical Security Plan, Revision 4, September 30, 1988

In Reference 1 TVA requested an exemption in accordance with 10 CFR 70.14, to allow the use of tamper-indicating type E seals to secure the fuel assembly storage areas at BLN instead of conducting annual physical inventories. Also, we requested to take credit for the last physical inventory which was conducted August 23, 1988.

The purpose of this letter is to clarify TVA commitments of adding hasps and padlocks to the doors. All doors within the fuel storage area are Underwriters Laboratories rated; therefore, they cannot be drilled to provide the padlock. The doors contain door locks. As required by Reference 2, locks and keys affecting the fuel storage areas shall be administered by the site nuclear security organization. All doors providing access to the defined spent fuel storage area will be locked and alarmed or access-controlled by members of the security force when fuel is present.

Instead of using padlocks, we now intend to use existing doorlocks. TVA will drill a hole in the door handles and run a wire loop through the hole anchored to the door frame or wall and add a seal to the wire loop instead of using hasps.

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Enclosed is a list of revised commitments. If you have any questions, please telephone Percy J. Hammons at (615) 751-2736. Unless this exemption request is granted, the next physical inventory of the nuclear fuel assemblies at BLN must occur not later than August 23, 1989. In order to make adequate preparation we need your response by August 15, 1989. Your timely attention to this request would be appreciated.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Manager, Nuclear Licensing and Regulatory Affairs

Enclosure cc (Enclosure):

Ms. S. C. Black, Assistant Director for Projects TVA Projects Division U.S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

Mr. B. A. Wilson, Assistant Directory for Inspection Programs TVA Projects Division U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

NRC Site Resident Inspector Watts Bar Nuclear Plant P.O. Box 700 Spring City, Tennessee 37381

ENCLOSURE

BELLEFONTE NUCLEAR PLANT (BLN) REQUEST FOR AN EXEMPTION FROM 10 CFR 70.51 (d)

The following is a list of revised commitments contained in request for an exemption from 10 CFR 70.51 (d).

- Add tamper-indicating type E seals (seal) to each end of the metal locking bar over the NFSV.
- 2. Add a wire loop and seal to the outside of the SFSP area to the main personnel entry door into the SFSP area.
- 3. Add a wire loop and seal to the other personnel door on the outside of the SFSP area.
- Add a seal to the hasp to the steel garage-style rollup door on the inside of the SFSP area.
- Add wire loop and seal to the storage room doors (2) inside of the SFSP area.
- 6. Inspect the four seals accessible from the fuel handling floor at intervals not to exceed 12 months.
- Write instructions for entry into the NFSV or the unit 2 SFSP area.
 Instructions will cover reason for entry, approval, breaking of seals, and new seal installation.

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