

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 ) 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)"
  2. 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):

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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).

1. 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.
4. Add a seal to the hasp to the steel garage-style rollup door on the inside of the SFSP area.
5. 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.
7. 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.

DOCKET NO. 70-2917 E 2941

CONTROL NO. 25854

DATE OF DOC. August 11, 1989

DATE RCVD. August 15, 1989

FCAF  PDR

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I & E REF.

SAFEGUARDS

FCTC \_\_\_\_\_ OTHER \_\_\_\_\_

DATE 8/15/89 INITIALS SL