

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

November 19, 1981

Director of Nuclear Reactor Regulation  
Attention: Ms. E. Adensam, Chief  
Licensing Branch No. 4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



Dear Ms. Adensam:

In the Matter of  
Tennessee Valley Authority

) Docket Nos. 50-327  
) 50-328

In your November 5, 1981 letter to H. G. Parris regarding emergency procedures and training for station blackout (B-63), you asked TVA to verify that "procedures exist for Sequoyah units 1 and 2 which guide operator actions necessary to maintain reactor coolant inventory and heat removal with only dc power available." Enclosed is our response to your request along with additional clarifications. Also in your November 5, 1981 letter, you stated the following: "In response to the the NRC generic letter 81-04 you state that the Special Low Power Test (#7) satisfies our requirement." The enclosure also provides some additional clarifications in response to that statement. This information was discussed with C. Stahle of your staff in a telephone conversation on November 18, 1981.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

A handwritten signature in cursive script, appearing to read "L. M. Mills".

L. M. Mills, Manager  
Nuclear Regulation and Safety

Sworn to and subscribed before me  
this 19th day of November 1981

Paulette H. White  
Notary Public

My Commission Expires 9-5-84

Enclosure

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ENCLOSURE  
RESPONSE TO NOVEMBER 5, 1981 LETTER FROM E. ADENSAM TO H. G. PARRIS  
EMERGENCY PROCEDURES AND TRAINING FOR STATION BLACKOUT  
(GENERIC LETTER 81-04)  
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

Special Low Power Test #7 procedure was not intended to satisfy the requirement for a "Loss of All ac Power" procedure. We stated that the test verified that equipment could be remotely operated to achieve core heat removal and reactor coolant system cooldown. As part of that test, we also verified that emergency lighting and ventilation was adequate; however, no action was taken to simulate control of reactor coolant inventory. We stated that current plant operating procedures for natural circulation and system operating instructions for operation of the turbine driven auxiliary feedwater system, coupled with the training and information gained from the special test, are adequate to handle this type of event until a "Loss of All ac Power" procedure is developed. We still believe this to be true.

We are actively involved in the Westinghouse Electric Corporation owners' group (WOG) effort to develop a generic "Loss of All ac Power" procedure guideline. Our efforts include both central office and plant staff participation in the development and review of the generic procedure guideline. In addition, members of both the Watts Bar and Sequoyah plant staffs have participated in the recent WOG Emergency Response Guidelines seminar. The generic "Loss of All ac Power" procedure guideline was reviewed at this seminar. The details and current status of the WOG effort on this project have been sent to NRC by the WOG by letter from R. W. Jurgensen (Westinghouse) to D. G. Eisenhut dated August 7, 1981. A general overview of the procedure guideline and its basis are currently being presented to the Sequoyah reactor operators during this year's requalification program.

Current TVA efforts on plant procedures are directed at complying with NUREG-0737 item I.C.1. It is our position that all procedure work must fit into this overall scheme. The plans call for reformatting current plant emergency procedures into Optimum Recovery Guidelines (ORG). The "Loss of All ac Power" procedure that TVA will develop from the WOG guidelines will be included as an Emergency Contingency Action procedure to the ORG. A loss of all ac power procedure will not be prepared separate from the overall integrated ORG program.

The entire procedure effort will require a significant amount of manpower for the preparation, review, and dissemination of the ORG and training on their use. We do not believe that the "Loss of All ac Power" procedure effort should be a parallel effort. It would result in a duplicate effort in reformatting and integration of the procedure into the ORG. More importantly, a duplication of effort, and the potential for confusion or distraction of the operator, would result from a parallel training effort.

In summary, TVA has a considerable effort underway in expanding the scope of and reformatting the plant emergency procedures. The "Loss of All ac Power" procedure work is included in the integrated procedure upgrade. TVA and the WOG have done considerable work on the basis for the "Loss of All ac Power" procedure. The plant staff at Sequoyah has been involved in the preparation and review of the generic procedure guideline. They have participated in the WOG Emergency Response Guidelines seminar. The Sequoyah reactor operators have been briefed on the general concepts of the procedure and its basis. The "Loss of All ac Power" procedure will be developed and implemented as part of the ORG, TVA's integrated response to NUREG-0737 item I.C.1.