

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

January 25, 1982



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Denton:

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

T. A. Ippolito's letter to H. G. Parris dated December 22, 1981 requested confirmation that deviations from the stated positions of NUREG-0737 Items II.E.4.1.2, II.F.1.1, and II.F.1.2 are solely scheduling and not technical.

At present, it is our intent that our request for deviations be a request for deferral of the schedule as outlined in our October 28, 1981 and November 3, 1981 letters to you. However, we believe that the following clarifications may be in order.

Items II.F.1.1 and II.F.1.2 - Effluent Monitors

We will provide continuous monitoring of high-level postaccident releases of noble gases and collection of radioiodines and particulates on sampling media with onsite laboratory analysis for all anticipated postaccident gaseous effluent pathways.

However, it should be noted that at the time of implementation, technical deviations may be requested to facilitate compromises between different criteria. One possible compromise could be that location of the sample collection equipment to reduce the radiation exposure of employees during sample removal, transport, and analysis may require sample line lengths that would not meet the criteria for representative or isokinetic sampling.

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Mr. Harold R. Denton

January 25, 1982

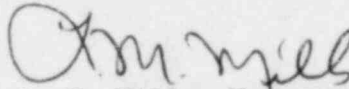
Item II.E.4.1.2 - Dedicated Hydrogen Penetrations

Your understanding of our position on this item (as stated in T. A. Ippolito's December 22, 1981 letter) is correct. The only modifications necessary to bring us into full compliance are those previously described on the vent side of the system. Our schedule for these modifications is outlined in my October 28, 1981 letter to you.

We will continue to inform you of any future changes in our proposed schedule. Any request for deviations and clarifications will be made as needed on a case-by-case basis. Your continuing cooperation is greatly appreciated.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Subscribed and sworn to before
me this 25th day of January 1982.

Paulette N. White
Notary Public

My Commission Expires 9-5-84