

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

March 8, 1983

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

Dear Ms. Adensam:

In the Matter of) Docket No. 50-327
Tennessee Valley Authority) 50-328

Enclosed is our response to the December 10, 1982 letter (NRC Generic Letter 82-28) from D. G. Eisenhut to "All Licensees of Operating Westinghouse and CE PWRs" regarding inadequate core cooling instrumentation system. As requested by the subject NRC letter, this information is being submitted pursuant to 10 CFR 50.54(f) of the Commission's regulations.

If you have any questions concerning this matter, please get in touch with J. E. Wills at FTS 858-2683.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Licensing

Sworn to and subscribed before me
this 8th day of March 1983

Paulette H. White
Notary Public
My Commission Expires 9-5-84

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Mr. James P. O'Reilly Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

3021
NRR/J Shea
NRR/DHFS/PTRB

ENCLOSURE

RESPONSE TO NRC GENERIC LETTER 82-28
INADEQUATE CORE COOLING INSTRUMENTATION SYSTEM
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

As requested in the December 10, 1982 letter from D. G. Eisenhut, we have completed our review of TVA's previous responses related to NUREG-0737, II.F.2 requirements. The following is our response to each of the three items in the subject letter.

NRC Requirement - Item 1

Within 90 days of the date of this letter, identify to the Director, Division of Licensing, the design for the reactor coolant inventory system selected and submit to the Director, Division of Licensing, detailed schedules for its engineering, procurement, and installation. References to generic design descriptions and to previous submittals containing the required information, where applicable, are acceptable.

TVA Responses

TVA plans to install the Westinghouse reactor vessel level instrumentation system (RVLIS) which NRC has stated in the December 10, 1982 letter as "acceptable for tracking reactor coolant system inventory."

Details of the design of the RVLIS are given in the proprietary version and nonproprietary version of:

Summary Report, Westinghouse Reactor Vessel Level Instrumentation System for Monitoring Inadequate Core Cooling (UHI plant).

This summary report was submitted to the NRC on January 2, 1981 by letter from L. M. Mills to A. Schwencer (NRC). As stated in my August 6 and November 22, 1982 letters to you we plan to complete the installation of the RVLIS during the second refueling outage for each unit. NRC has accepted this schedule for unit 1 by issuance of a revised license condition, 2.C.(23)H.2 in License Amendment 23 to Facility Operating License, dated December 27, 1982.

NRC Requirement - Item 2

Within 90 days of the date of this letter, review the status of conformance of all components of the ICC instrumentation system including subcooling margin monitors, core-exit thermocouples, and the reactor coolant inventory tracking system with NUREG-0737, item II.F.2 and submit a report on the status of such conformance.

TVA Response

As stated in the Sequoyah Nuclear Plant Safety Evaluation Report (SER), NUREG-0011 (Supplements 1 and 2), NRC considers TVA's plans for using the subcooling meter with the plant computer as acceptable for full power operation.

The short-term NUREG-0737, item II.F.2 requirements for core-exit thermocouples have been met as verified by the NRC onsite inspectors' report No. 50-327/82-03 and 50-328/82-03 which was transmitted to TVA by the March 5, 1982 letter from F. S. Cantrell to H. G. Parris. The thermocouple system will be further upgraded as stated in my September 4 and November 6, 1981 and March 15, 1982 letters to you regarding Regulatory Guide 1.97 Revision 2.

NRC Requirement - Item 3

The installation of the ICC instrumentation system shall be completed during the earliest refueling shutdown consistent with the existing status of the plant and practical design and procurement considerations. It has become apparent through discussions with owners' groups and individual licensees that schedules must adequately consider the integration of these requirements with other TMI-related activities. In recognition of this and the difficulty in implementing generic deadlines, the Commission has adopted a plan to establish realistic plant-specific schedules that take into account the unique aspects of the work at each plant. Each licensee is to develop and submit its own plant-specific schedule which will be reviewed by the assigned NRC project manager. The NRC project manager and licensee will reach an agreement on the final schedule and in this manner provide for prompt implementation of these important improvements while optimizing the use of utility and NRC resources.

TVA Response

TVA plans to upgrade the core-exit thermocouple system in accordance with the response made on Regulatory Guide 1.97 revision 2 by my March 15, 1982 letter to you. This item will be completed as part of the TVA integrated plan to SECY-82-111B (NRC Generic Letter 82-33). Development of operating procedures is proceeding with the Westinghouse Owners Group. As stated in our response to Item 1, TVA plans to complete the installation of the RVLIS by the end of the second refueling outage for each unit.