

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

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USNRC

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Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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PROPOSED RULE *PR-Misc Notice*  
*(Reg. Guide)*

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Attention: Docketing and Service Branch

Dear Sir:

In accordance with provisions for public review and comment indicated in the Federal Register on January 17, 1979, TVA is pleased to provide the enclosed comments on regulatory guide:

Regulatory Guide 1.97  
Revision 3

"Instrumentation For Light-Water-Cooled Nuclear  
Power Plants To Assess Plant And Environs  
Conditions During And Following An Accident"

Since the content and interpretation of regulatory guides have a large impact on TVA's extensive nuclear commitment, we welcome the opportunity for review and comment. TVA's comments on additional regulatory guides will be forthcoming as a part of a continuing program.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

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

cc (Enclosure):

Executive Secretary  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Tom Tipton  
AIF, Inc.  
7101 Wisconsin Avenue  
Bethesda, Maryland 20014

*DS09*  
*add: Ed Hill, 1130 SS*

830823035B 830817  
PDR REGGD  
01.097 C PDR

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ENCLOSURE

1. Page 1.97-5, Table 1, Category 1, Item 1 - We believe that the first paragraph should be modified as follows: "The instrumentation should be qualified in accordance with 10 CFR 50.49 and Regulatory Guide 1.89 (Qualification of Class 1E Equipment for Nuclear Power Plants). The methodology described in NUREG-0588 (Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment) represents an acceptable method of qualifying equipment in the harsh environment."
2. Page 1.97-28, Table 3, Type E Variables - We believe that the range given for the concentrations for water are conservative. We hope that the work presently underway on source term calculations can more appropriately define these ranges.