



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 25, 2000

LICENSEE: Tennessee Valley Authority

FACILITY: Watts Bar Nuclear Plant, Unit 1
Sequoyah Nuclear Plant, Units 1 and 2

SUBJECT: SUMMARY - AUGUST 24, 2000, MEETING WITH TVA TO BRIEF THE STAFF
ON THE STATUS OF PLANS FOR TRITIUM PRODUCTION

On August 24, 2000, representatives of the Tennessee Valley Authority (TVA), the licensee for Watts Bar Nuclear Plant (WBN) and Sequoyah Nuclear Plant (SQN), met with members of the U.S. Nuclear Regulatory Commission (NRC) staff at NRC Headquarters in Rockville, Maryland. TVA requested this meeting to brief the staff regarding ongoing efforts to prepare licensing documentation to enable the production of tritium at WBN and/or SQN. The most recent meeting in this series was held on March 23, 2000. This summary should be considered as a continuation of the summary of the March 23, 2000, meeting. A list of attendees is provided in Enclosure 1. The handout provided by TVA during the meeting is included as Enclosure 2.

TVA began the meeting with a summary of the program status (Enclosure 2, page 3). TVA stated that Westinghouse would provide fuel for WBN and Framatome Cogema Fuels (FCF) would provide fuel for SQN. An equilibrium core for tritium production was indicated to consist of 96 fuel assemblies (FAs) with about 2300 tritium producing burnable absorber rods (TPBARs). This would be achieved in stages with the first loading of TPBARs for a reactor is expected to involve 72 FAs with about 1700 TPBARs. License amendment submittals for SQN and WBN are still on track to be submitted in January 2001.

TVA stated that proposed Technical Specification (TS) changes would be an increase in the boron concentration in the refueling water storage tank and cold leg accumulators into the 3500 parts per million range (page 4). TVA noted that the environmental impact discussion will be based in part on an Environmental Impact Statement issued some 2 years ago by DOE which has been adopted by TVA.

TVA described the contents of the application as including a report by the fuel vendor for each plant, Final Safety Analysis Report markups, an assessment of the differences of the applications from the underlying Department of Energy (DOE) Topical Report and a discussion of how TVA has responded to each of the 17 specific interface items identified by the NRC staff in NUREG-1672 (pages 5 and 6).

TVA indicated that the exact number of TPBARs to be irradiated had not been proposed yet, but the target production rate would most likely require the use of WBN and SQN Unit 2 in the initial production phase. TVA also indicated that DOE will be the shipper of record, the pellet vendor has not yet been selected but would be under Pacific Northwest National Lab's direction, and that the TPBAR assembler would be Wesdyne, a subsidiary of Westinghouse (page 7).

DFC1

For the interface item on compliance with departure from nucleate boiling criterion, TVA indicated that no additional topicals would be needed for Westinghouse WBN fuel and that an FCF topical would accompany the SQN amendment (page 8).

For the interface item on reactor vessel integrity, TVA indicated that the reactor vessel neutron fluence would be maintained within vessel fluence analysis assumptions and that no additional testing beyond normal surveillance capsule analysis is currently planned. The NRC staff expressed concern that TVA had not proposed further responses to the vessel surveillance issue discussed in the NRC staff's summary of its meeting with TVA on February 9, 2000, and urged TVA to consider this issue further (page 9).

TVA summarized its response to the control room habitability systems, hydrogen and light load handling systems issues (pages 10, 11, 12).

TVA indicated that it is considering a revision to the design basis for the spent fuel pool cooling and associated systems to reflect a reliance on both trains of the cooling system to accommodate the increased heat load into the spent fuel pool. Otherwise, a 10 to 20 hour delay in start of off-loading of fuel upon shutdown would be required until the decay heat was reduced to less than design allowable values (pages 13, 14).

The spent fuel storage, demineralized water makeup, liquid waste management and process and effluent radiological monitoring and sampling systems are summarized on pages 15 - 18. The submittal on the LOCTA-JR code on June 23, 2000, was noted, however the staff's review has not progressed to the point of identification of requests for additional information.

TVA indicated that an evaluation of anticipated transient without scram would be submitted in September 2000 for WBN and SQN.

TVA indicated that no Technical Specification (TS) changes are anticipated for pressure and temperature limits, low temperature overpressure protection systems or new fuel storage TS (pages 20, 21) and reviewed the need for increased boron concentrations (page 22).

In summary, TVA stated that it planned to confirm the disposition of all of the additional items identified in the DOE Topical Report as needing confirmation of completion and that no additional issues beyond the scope of the DOE Topical Report had been discovered (page 23).


Robert E. Martin, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-390, 50-327, and 50-328

Enclosures: 1. Attendance List
 2. TVA Handout
 3. General License Considerations Handout

cc w/enclosures: See next page

September 25, 2000

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/RA/

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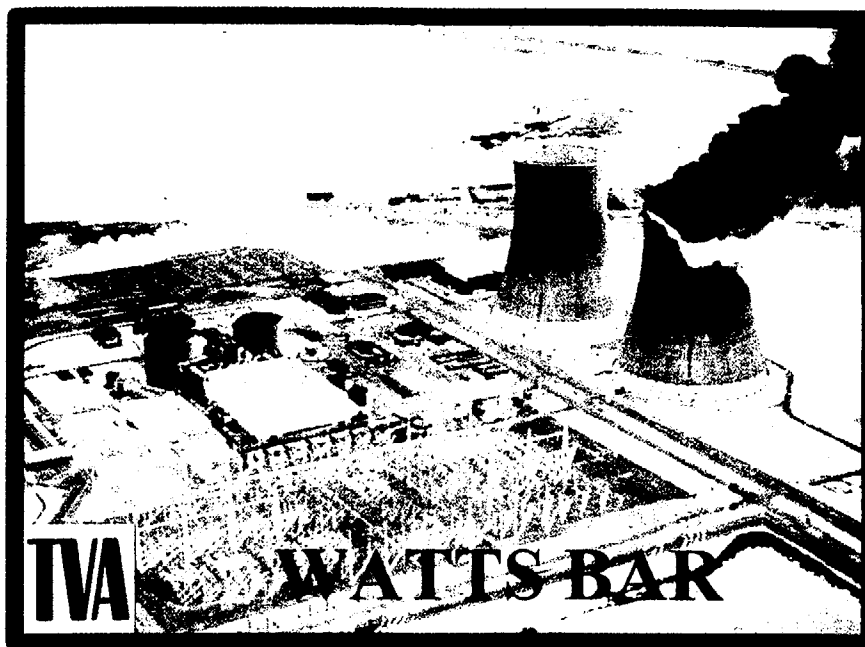
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CYang
JGuo
BKeeling
BMcDowell

**TRITIUM PRODUCTION PROGRAM
STATUS MEETING
AUGUST 24, 2000**

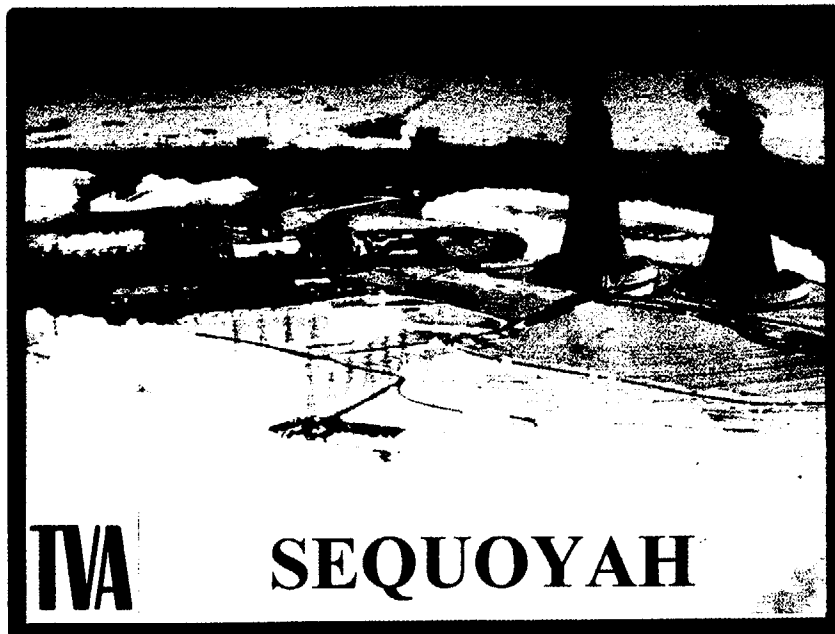
Bob Martin	NRR/DLPM
Ralph Caruso	NRR/SRXB
Keith Wichman	NRR/EMCB
Tony Attard	NRR/DSSA/SRXB
Ann Hodgdon	OGC/RP
Keith Weller	TVA/SQN Licensing/OPS-4C-SQN
Ken Heck	NRR
Michelle Hart	NRR/DSSA/SPSB
Stephen Klementowicz	NRR/IOLB/EP&HP
Sidney Crawford	Consultant (Sell)
Stephen LaVie	NRR/DSSA/SPSB
Allen Hiser	NRR/DE/EMCB
James Davis	NRR/DE/EMCB
Jeanette Pablo	TVA-Washington Office
Chang-Yang Li	NRR/DSSA/SPLB
O. Wesley Taylor	DOE/DP-251
Gerald Sorensen	PNNL
Jin-Sien Guo	NRR/DSSA/SPLB
Betsy Keeling	NRC/OCA
Rickey Stockton	TVA/WBN Licensing
Sheldon L. Trubatch	Hopkins & Sutter/Self
Bill McDowell	NRC/OIG
Jim Chardos	TVA
Ralph H. Shell	TVA
Richard P. Correia	NRC/NRR/DLPM/PDII-2
Ronald W. Hernan	NRC/NRR/DLPM/PDII-2
Herbert N. Berkow	NRC/NRR/DLPM/PDII



TRITIUM PROGRAM



WATTS BAR



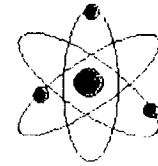
SEQUOYAH

NRC BRIEFING

AUGUST 24, 2000



Tritium Program Agenda

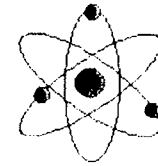


- Program Status - Jim Chardos
- License Amendment Content - Ralph Shell
- Preliminary Status on 17 Interface Items - Jim Chardos
- Preliminary Status on Technical Specification Changes - Jim Chardos
- Summary - Jim Chardos



Tritium Program

Program Status

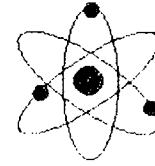


- Fuel Vendor
 - Fuel Cycle Design Complete
 - Maximum of 96 fresh assemblies - $2300 \pm$ TPBARs
 - Fuel Cycle Source Term Complete
 - Utilized existing approved methodologies
- TVA analysis shows Tritium Production Core source term bounded by source term of record (No effect on EQ)
 - EQ Radiation Calculations performed using standard methodologies contained in NUREG-0588
 - Standard EQ dose assumptions used, e.g., 100% noble gases, 50 % iodines, and 1% other radioisotopes released instantaneously at time = 0 seconds of release
- TPBAR design review late August
 - Certify TPBAR design meets plant design parameters
 - Includes review of changes from design presented in TPC Topical Report
- License amendment submittals for WBN and SQN - on schedule for 1/01



Tritium Program

License Amendment Content

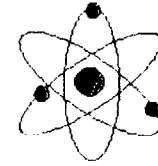


- Cover Letter
 - Will describe the purpose of the license amendment request
 - Will serve as the “table of contents” for the information provided in the enclosures
- Technical Specification Change Description
 - This section will include the specific Technical Specification changes required to support the Tritium Program.
 - This section will include:
 - Descriptions of the proposed changes (e.g., RWST/CLA boron concentration changes)
 - Reason for the changes
 - Safety analysis to support the changes
 - No Significant Hazards Determination
 - Environmental impact discussion



Tritium Program

License Amendment Content

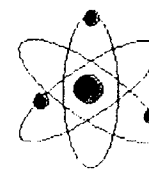


- Will provide report prepared by fuel vendor for each plant (Westinghouse for WBN, FCF for SQN) and expect reports to contain:
 - Confirmation Of Confirming Checks/Differences From Topical Report
 - Will address TVA's results in performing the plant specific confirming checks identified in DOE Topical Report Tables (Statement of results)
 - Will also address significant differences between TVA's plants and the reference plant described in the Topical Report
 - Will also address significant differences for Fuel Vendors and PNNL in their areas of responsibility
 - Seventeen Interface Items
 - Will address in sufficient detail the specific seventeen interface items identified in the NRC SER



Tritium Program

License Amendment Content

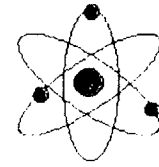


- FSAR Markups Associated With Technical Specification Changes
 - Will provide the FSAR page markups associated with any significant changes as a result of technical specification changes
 - These changes and other areas of the FSAR that may require changes will be included in the regularly required FSAR update
- List Of Commitments
 - Will provide a list of commitments made by TVA in this license amendment request
 - Production TPBAR 1st and 2nd cycle surveillance program
- Other item requested in SER
 - Watts Bar Lead Test Assembly TPBAR Post Irradiation Examination results



Tritium Program

Preliminary Status - 17 Interface Items



(1) Handling of TPBARs

- Fresh and irradiated TPBARs will be handled using existing procedures and tooling prior to consolidation.
- The consolidation process will use specialized tooling and procedures to move and consolidate TPBAR rods into containers for shipping.
- Consolidation fixture and work platform to be installed in SFP cask area
- Shipping casks will be certified by DOE.

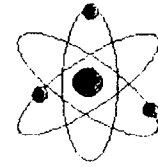
(2) Procurement and fabrication issues

- TVA contractually requires that DOE:
 - Procure materials and services from suppliers acceptable to TVA
 - Impose TVA technical, functional, quality, and regulatory requirements on suppliers, including 10 CFR 21 and 10 CFR 50, Appendix B
- TVA ensures compliance through:
 - Review of applicable DOE documents (e.g., procurement and program documents)
 - Evaluation of DOE's TPBAR and related service suppliers for inclusion on TVA's acceptable suppliers list through program reviews and audits



Tritium Program

Preliminary Status - 17 Interface Items



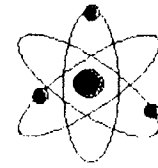
(3) Compliance with DNB criterion

- Confirmation that DNB design basis is met is a routine part of the reload design process.
- Power distributions will be analyzed to ensure that the DNB design basis is met for the Watts Bar and Sequoyah TPC Designs.
- Standard NRC-approved methods are applicable for DNB performance analysis of the TPC cores.
- Scoping results performed for 96 feed equilibrium and transition cycles indicate results will be acceptable.
- Presence of TPBARs is not expected to challenge the DNB design basis.



Tritium Program

Preliminary Status - 17 Interface Items

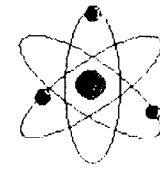


- (4) Reactor vessel integrity analysis (Appendices G and H to 10 CFR Part 50 and 10 CFR 50.61)
- The SQN and WBN vessels currently meet the requirements of Appendices G and H to 10 CFR 50 and of 10 CFR 50.61.
 - Tritium Production Core designs have been developed which limit power in the peripheral fuel assemblies in order to maintain the reactor vessel neutron fluence within vessel fluence analysis assumptions (Maintain low leakage cores).
 - Therefore, the vessels will continue to meet the requirements of Appendices G and H to 10CFR 50 and of 10 CFR 50.61.
 - No additional testing beyond normal surveillance capsule analysis is currently planned.



Tritium Program

Preliminary Status - 17 Interface Items



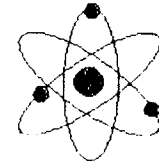
(5) Control room habitability systems

- Technical Requirements Manual Section TR 2.15.6 discusses radiological consequences of accidents, and their impact on Control Room Habitability.
- The reference plant assumed ECCS leak rate criteria of 2 gpm.
 - This high value resulted in exceeding the relevant dose criterion.
 - Control room doses are directly influenced by ECCS leak rate assumptions.
- SER Section 2.6.1 noted the high ECCS leak rate is a default value.
 - Current industry experience indicates that 2 gallons per hour is a more reasonable value, whereby the dose criterion would not have been exceeded.
- Existing ECCS leak rate values for WBN and SQN are approximately 1 gallon/hr
- Analysis will be performed on the control room habitability systems.
 - Based on low existing ECCS leak rate, TVA is confident that current analysis efforts will prove that there is no impact on control room dose rates, and therefore, no impact on control room habitability systems.



Tritium Program

Preliminary Status - 17 Interface Items

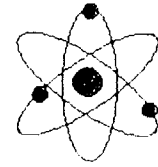


- (6) Specific assessment of hydrogen source and timing of recombiner operation
- Assessment of post-LOCA hydrogen generation buildup to conservatively address additional sources associated with TPC including
 - Zirc-water reactions with getter materials contained in the TPBARs
 - Release of all tritium produced in the TPBARs
 - Regulatory Guide 1.7 lower flammability limit of 4 volume percent is approached when containment contains approximately 40,000 - 50,000 standard cubic feet (scf)
 - Total hydrogen volume added by sources related to TPC expected to be approximately 500 scf
 - Preliminary evaluations indicate that:
 - Contribution of TPBARs to the limiting post-LOCA hydrogen concentration is approximately 1% of the total.
 - This contribution will not be a significant factor in the timing of recombiner operation.



Tritium Program

Preliminary Status - 17 Interface Items



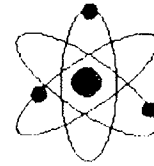
(7) Light-load handling system

- Handling of irradiated TPBARs during refueling activities shall be with the burnable poison handling tool previously evaluated as acceptable for handling irradiated burnable poison assemblies.
- Weight of base-plate with maximum 24 TPBARs expected to be approximately 60 lbs. versus 50 lbs. for burnable poison assembly.
- Previous FSAR drop analysis bounds TPBAR handling activity.
- Handling of TPBARs will not challenge light-load handling system.



Tritium Program

Preliminary Status - 17 Interface Items

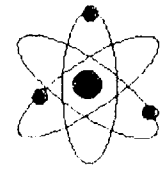


- (8) Station service water system, (9) Ultimate heat sink, (11) Spent fuel pool cooling and cleanup system, and (12) Component cooling water system (CCS)
- The Topical Report/SER suggest a large increase in Spent Fuel Pool (SFP) decay heat load and a resultant increase in SFP temperature.
 - TVA currently offloads the entire core each outage.
 - Existing licensing basis for SQN and WBN requires delaying off load of core until decay heat is less than design allowable values.
 - While there is no impact on heat loads to cooling systems, a potential 10 to 20 hour delay in start of off-loading may occur, depending on core performance variables.
 - TVA proposes to revise the design basis allowable decay heat values.
 - Current allowable decay heat values assume loss of single train of SFP cooling.
 - Three safety related pumps provide cooling through two independent heat exchangers.



Tritium Program

Preliminary Status - 17 Interface Items



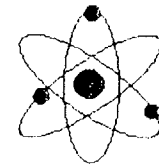
(Items 8,9,11 and 12 continued)

- Single active failure would not result in loss of train of cooling.
- Probability of complete loss of one train of cooling is very low.
- TVA proposes to revise the licensing basis to take credit for two trains of cooling.
- TVA will provide operational guidance for multiple active failures leading to single train operation.
- Since credit will be taken for two trains, increased heat load can be placed in SFP, without an increase in temperature, beyond current maximum faulted condition temperatures.
- Therefore, since the SFP temperature does not increase above currently analyzed faulted condition maximum temperature, there is no impact on CCS, ERCW or Ultimate Heat Sink.



Tritium Program

Preliminary Status - 17 Interface Items



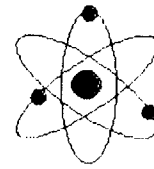
(10) New and spent fuel storage

- Both SQN and WBN new and spent fuel racks are seismic Category I equipment.
- TPBAR weight less than RCCAs which has been analyzed for Category I seismic event
- TPBAR dimension and geometry approximate burnable poison clusters which are acceptable for storage in the racks
- Existing maximum enrichment limit for new fuel storage is bounding for TPBARs
- No new criticality analysis is needed for the new fuel storage area.
- Criticality analyses for the spent fuel pool racks will be evaluated for TPBAR impacts.



Tritium Program

Preliminary Status - 17 Interface Items



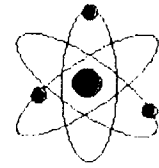
(13) Demineralized water makeup system

- The burden imposed on the Demineralized Water Makeup System (DWMS) as a result of tritium production is directly related to the RCS tritium level management plan.
- TVA is proposing to maintain normal feed and bleed operations and allow tritium levels to increase in the RCS, up to the 6-9 $\mu\text{Ci/g}$ level. This scheme offers no challenges to the DWMS.
- Preliminary analysis indicate that with two TPBAR failures at EOL, the feed and bleed required to reduce tritium concentrations to normal levels will be well within the capacity of the DWMS.
- The DWMS at both candidate sites for tritium production consists of vendor-supplied equipment capable of supplying over 200 gpm capacity.
- Adequate demineralized water storage capacity, combined with existing production capacity is currently available to meet the expected demand, without requiring changes to the existing system or vendor services contracts.



Tritium Program

Preliminary Status - 17 Interface Items



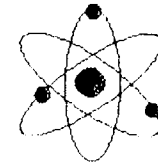
(14) Liquid waste management system

- RCS tritium analysis frequency will be dictated by tritium concentration.
- RCS peak tritium concentration (Non-TPC) is 2.0 - 3.0 $\mu\text{Ci/g}$.
- Do not anticipate changes to current RCS feed and bleed scheme for boron control.
- Best estimate RCS peak tritium concentration with TPBAR Permeation is 6-9 $\mu\text{Ci/g}$.
 - This concentration range does not present any additional radiological issues.
 - Associated tritium effective dose in containment will increase < 1 mrem/hr.
 - Sufficient margin exists such that limits in the ODCM will still be met for normal TPC operation.
- Best estimate RCS peak tritium concentration with 2 failures is 80-100 $\mu\text{Ci/g}$
 - Concentration can be lowered to normal within 20 days.



Tritium Program

Preliminary Status - 17 Interface Items



(15) Process and effluent radiological monitoring and sampling system

- Current process and effluent monitoring instrumentation and sampling systems adequate for TPC operation
- SFP tritium sampling will be increased during movement of fuel contain TPBARs or while performing TPBAR consolidation.
- RCS tritium sampling frequency will be dictated by tritium concentration.

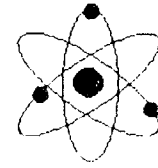
(16) Use of LOCTAJR code for LOCA analyses

- LOCTAJR code submitted by TVA on both plant dockets on 6/23/00
- NRC staff review underway
- Non- proprietary version is being developed for September submittal.



Tritium Program

Preliminary Status - 17 Interface Items



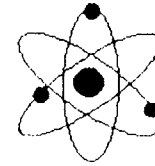
(17) ATWS analysis

- Compliance of the TPBAR core with the relevant ATWS analyses supporting the basis of the Final ATWS Rule 10CFR 50.63(b) will be demonstrated by evaluation.
- Reactivity feedback characteristics of the TPBAR core will be examined.
 - Like the standard core design, the TPBAR core MTC remains negative during operation at all times in core life.
 - The TPBAR core MTC is more negative than the standard core MTC during the portion of the cycle when ATWS events are a concern.
 - The more negative MTC enhances the mitigation of the ATWS event and assures that the ATWS performance of the core will be the same or better.
 - The current ATWS analysis basis will remain applicable in support of licensing the TPBAR core.
- TVA will submit an ATWS evaluation for WBN and SQN in September.



Tritium Program

Preliminary Status on Technical Specification Changes NRC Identified in SER

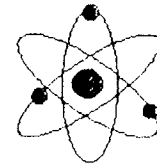


- TS 3.4.3 for WBN (TS 3.4.9 for SQN) - RCS Pressure and Temperature (P/T) Limits
 - Watts Bar - No change to Tech Spec since limit curves are in PTLR. In addition, vessel fluences are expected to remain within vessel fluence analysis assumptions and consequently there is no anticipated change to PT limit curves in PTLR.
 - Sequoyah - Vessel fluences are expected to remain within vessel fluence analysis assumptions and consequently there is no anticipated change to PT limit curves in Tech Spec.
- TS 3.4.12 - Low-Temperature Overpressure Protection (LTOP) System
 - Watts Bar - No change to Tech Spec since LTOP setpoints are in PTLR. In addition, PT limit curves are not expected to change and consequently there is no anticipated change to LTOP setpoints in PTLR.
 - Sequoyah - PT limit curves are not expected to change and consequently there is no anticipated change to LTOP setpoints in Tech Specs.



Tritium Program

Preliminary Status on Technical Specification Changes NRC Identified in SER



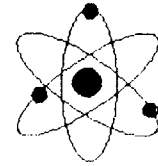
- TS 3.7.17 - Spent Fuel Assembly Storage
 - Spent Fuel Storage analyses will be evaluated to ensure that TPBAR impacts do not affect the enrichment and burnup domains.

- TS 4.3 - Design Features, Fuel Storage
 - No change needed to the New Fuel Storage Tech Spec.
 - Spent Fuel Storage analyses will be evaluated for impacts due to TPBAR use.



Tritium Program

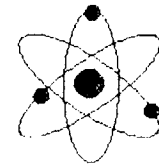
**Preliminary Status on
Technical Specification Changes
TVA Identified in Current Review**



- RWST and Cold Leg Accumulators (CLA) Boron Concentration Limit Changes
 - Post-LOCA long term core cooling analysis requires maintaining a subcritical boron concentration after all boration sources are injected and mixed in the containment sump without taking credit for any RCCA insertion.
 - Boration sources consist of:
 - Cold leg accumulators
 - Refueling water storage tank
 - Melted ice from the ice condenser.
 - TPBAR cores contain significantly more neutron poison than standard cores.
 - Additional lithium aluminate poison results in decreased worth for all neutron poisons (including RCS boron) due to increased competition for available neutrons.
 - The positive reactivity insertion that results from the cooldown (due to the negative temperature coefficient) must be entirely overcome by RCS boron.
 - Because the RCS boron is now worth less, a higher concentration in the RWST is required to mix with the other boration sources and maintain subcriticality.
 - The boron concentration for the CLAs will also be increased.



Tritium Program Summary



- License amendments submittals on schedule - 1/31/01
 - Will consist of reports from both fuel vendors
 - Will reference the DOE TPC Topical and note differences, and SER
- TVA preliminary determination
 - No additional issues beyond the scope of the DOE TPC Topical have been discovered.

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