

March 7, 2000

Template NRR-058

Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

SUBJECT: WATTS BAR NUCLEAR PLANT, UNIT 1 - ISSUANCE OF AMENDMENT
REGARDING POTENTIAL MAIN STEAM OVERPRESSURIZATION CONDITION
(TAC NO. MA6045)

Dear Mr. Scalice:

The Commission has issued the enclosed Amendment No. 19 to Facility Operating License No. NPF-90 for Watts Bar Nuclear Plant, Unit 1. This amendment is in response to your application dated June 25, 1999, as supplemented December 17, 1999. The amendment principally revises the Main Steam Safety Valve Technical Specifications (TS) section 3.7.1, to provide a new requirement to reduce the power range neutron flux-high reactor trip setpoints when two or more main steam safety valves per steam generator are inoperable.

A copy of the safety evaluation is also enclosed. Notice of issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/

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

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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A copy of the safety evaluation is also enclosed. Notice of issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

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

Docket No. 50-390

Enclosures: 1. Amendment No. 19 to NPF-90
2. Safety Evaluation

cc w/enclosures: See next page



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

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-390

WATTS BAR NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 19
License No. NPF-90

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Tennessee Valley Authority (the licensee) dated June 25, 1999, as supplemented December 17, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-90 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 19 , and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. TVA shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance, and shall be implemented no later than 30 days from the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard Correia, Chief, Section 2
Project Directorate II
Division of Project Licensing Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: **March 7, 2000**

ATTACHMENT TO AMENDMENT NO. 19
FACILITY OPERATING LICENSE NO. NPF-90
DOCKET NO. 50-390

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

Remove Pages

3.7-1
3.7-3
B 3.7-1
B 3.7-2
B 3.7-3
B 3.7-4
B 3.7-5
B 3.7-6

Insert Pages

3.7-1
3.7-3
B 3.7-1
B 3.7-2
B 3.7-3
B 3.7-4
B 3.7-5
B 3.7-6

3.7.1 Main Steam Safety Valves (MSSVs)

LCO 3.7.1 Five MSSVs per steam generator shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each MSSV.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more steam generators with one MSSV inoperable.	A.1 Reduce THERMAL POWER to $\leq 59\%$ RTP.	4 hours
B. One or more steam generators with two or more MSSVs inoperable.	B.1 Reduce THERMAL POWER to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs. <u>AND</u> -----NOTE----- Only required in MODE 1 -----	4 hours
	B.2 Reduce the Power Range Neutron Flux - High reactor trip setpoint to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 for the number of OPERABLE MSSVs.	36 hours
C. Required Action and associated Completion Time not met. <u>OR</u> One or more steam generators with ≥ 4 MSSVs inoperable.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Be in MODE 4.	12 hours

Table 3.7.1-1 (page 1 of 1)
OPERABLE Main Steam Safety Valves versus
Maximum Allowable Power

NUMBER OF OPERABLE MSSVs PER STEAM GENERATOR	MAXIMUM ALLOWABLE POWER (% RTP)
3	≤ 42
2	≤ 26

B 3.7 PLANT SYSTEMS

B 3.7.1 Main Steam Safety Valves (MSSVs)

BASES

BACKGROUND

The primary purpose of the MSSVs is to provide overpressure protection for the secondary system. The MSSVs also provide protection against overpressurizing the reactor coolant pressure boundary (RCPB) by providing a heat sink for the removal of energy from the Reactor Coolant System (RCS) if the preferred heat sink, provided by the Condenser and Circulating Water System, is not available.

Five MSSVs are located on each main steam header, outside containment, upstream of the main steam isolation valves, as described in the FSAR, Section 10.3.2 (Ref. 1). The MSSVs must have sufficient capacity to limit the secondary system pressure to $\leq 110\%$ of the steam generator design pressure in order to meet the requirements of the ASME Code, Section III (Ref. 2). The MSSV design includes staggered setpoints, according to Table 3.7.1-2 in the accompanying LCO, so that only the needed valves will actuate. Staggered setpoints reduce the potential for valve chattering that is due to steam pressure insufficient to fully open all valves following a turbine reactor trip.

APPLICABLE
SAFETY ANALYSES

The design basis for the MSSVs comes from Reference 2 and its purpose is to limit the secondary system pressure to $\leq 110\%$ of design pressure for any anticipated operational occurrence (AOO) or accident considered in the Design Basis Accident (DBA) and transient analysis.

The events that challenge the relieving capacity of the MSSVs, and thus Main Steam System pressure, are those characterized as decreased heat removal events, which are presented in the FSAR, Section 15.2 and 15.4 (Ref. 3). Of these, the full power loss of normal feedwater is the limiting AOO. The transient response for this event presents no hazard to the integrity of the RCS or the Main Steam System.

Following the loss of continued subcooled feedwater addition, the primary and secondary-side temperatures increase, resulting in a secondary-side pressure increase that proceeds all the way up to the lowest safety valve setpoint. The receipt of a low-low steam generator water level reactor trip signal releases the RCCAs to fall into the core and provides a turbine trip signal. Following the turbine trip, all MSSVs are briefly actuated while rods fall

(continued)

BASES

APPLICABLE
SAFETY ANALYSES
(continued)

into the core and the hot leg inventory is purged of hot reactor coolant. After the core is shutdown, the required relief capacity is reduced, and one MSSV per steam generator remains open during the remainder of the transient.

In addition to the decreased heat removal events, reactivity insertion events may also challenge the relieving capacity of the MSSVs. The uncontrolled rod cluster control assembly (RCCA) bank withdrawal at power event is characterized by an increase in core power and steam generation rate until reactor trip occurs when either the Overtemperature ΔT or Power Range Neutron Flux-High setpoint is reached. Steam flow to the turbine will not increase from its initial value for this event. The increased heat transfer to the secondary side causes an increase in steam pressure and may result in opening of the MSSVs prior to reactor trip, assuming no credit for operation of the atmospheric or condenser steam dump valves. The FSAR Section 15.2 safety analysis of the RCCA bank withdrawal at power event for a range of initial core power levels demonstrates that the MSSVs are capable of preventing secondary side overpressurization for this AOO.

The FSAR safety analyses discussed above assume that all of the MSSVs for each steam generator are OPERABLE. If there are inoperable MSSV(s), it is necessary to limit the primary system power during steady-state operation and AOOs to a value that does not result in exceeding the combined steam flow capacity of the turbine (if available) and the remaining OPERABLE MSSVs. The required limitation on primary system power necessary to prevent secondary system overpressurization may be determined by system transient analyses or conservatively arrived at by a simple heat balance calculation. In some circumstances it is necessary to limit the primary side heat generation that can be achieved during an AOO by reducing the setpoint of the Power Range Neutron Flux-High reactor trip function. For example, if more than one MSSV on a single steam generator is inoperable, an uncontrolled RCCA bank withdrawal at power event occurring from a partial power level may result in an increase in reactor power that exceeds the combined steam flow capacity of the turbine and the remaining OPERABLE MSSVs. Thus, for multiple inoperable MSSVs on the same steam generator it is necessary to prevent this power increase by lowering the Power Range Neutron Flux-High setpoint to an appropriate value.

The MSSVs are assumed to have two active failure modes. The active failure modes are spurious opening, and failure to reclose once opened.

The MSSVs satisfy Criterion 3 of the NRC Policy Statement.

(continued)

BASES (continued)

LCO

The accident analysis requires that five MSSVs per steam generator be OPERABLE to provide overpressure protection for design basis transients occurring at 102% RTP. The LCO requires that five MSSVs per steam generator be OPERABLE in compliance with Reference 2 and the DBA analysis.

The OPERABILITY of the MSSVs is defined as the ability to open upon demand within the setpoint tolerances to relieve steam generator overpressure, and reseal when pressure has been reduced. The OPERABILITY of the MSSVs is determined by periodic surveillance testing in accordance with the Inservice Testing Program.

This LCO provides assurance that the MSSVs will perform their designed safety functions to mitigate the consequences of accidents that could result in a challenge to the RCPB, or Main Steam System integrity.

APPLICABILITY

In MODES 1, 2, and 3, five MSSVs per steam generator are required to be OPERABLE to prevent Main Steam System overpressurization.

In MODES 4 and 5, there are no credible transients requiring the MSSVs. The steam generators are not normally used for heat removal in MODES 5 and 6, and thus cannot be overpressurized; there is no requirement for the MSSVs to be OPERABLE in these MODES.

ACTIONS

The ACTIONS table is modified by a Note indicating that separate Condition entry is allowed for each MSSV.

With one or more MSSVs inoperable, action must be taken so that the available MSSV relieving capacity meets Reference 2 requirements.

Operation with less than all five MSSVs OPERABLE for each steam generator is permissible, if THERMAL POWER is limited to the relief capacity of the remaining MSSVs. This is accomplished by restricting THERMAL POWER so that the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator.

(continued)

BASES

ACTIONS
(continued)A.1

In the case of only a single inoperable MSSV on one or more steam generators a reactor power reduction alone is sufficient to limit primary side heat generation such that overpressurization of the secondary side is precluded for any RCS heatup event. Furthermore, for this case there is sufficient total steam flow capacity provided by the turbine and remaining OPERABLE MSSVs to preclude overpressurization in the event of an increased reactor power due to reactivity insertion, such as in the event of an uncontrolled RCCA bank withdrawal at power. Therefore, Required Action A.1, requires an appropriate reduction in reactor power within 4 hours.

The maximum THERMAL POWER corresponding to the heat removal capacity of the remaining OPERABLE MSSVs is determined using a conservative heat balance between the reactor coolant system heat generation and the steam relief through the OPERABLE MSSVs, as shown below and described in the attachment to Reference 6:

$$\text{Allowable THERMAL POWER Level (\%)} = 100 \frac{4 w_s h_{fg}}{QK}$$

- where:
- w_s = Minimum total steam relief capacity of the OPERABLE MSSVs on any one steam generator, in lbm/sec.
 - h_{fg} = heat of vaporization at the highest MSSV full-open pressure, in Btu/lbm.
 - Q = NSSS power rating of the plant (includes reactor coolant pump heat) in Mwt.
 - K = Unit conversion factor: 947.82 Btu/sec/Mwt.

Note: The values in Specification 3.7.1 include an allowance for instrument and channel uncertainties to the allowable RTP obtained with this algorithm.

(continued)

BASES

ACTIONS
(continued)B.1 and B.2

In the case of multiple inoperable MSSVs on one or more steam generators, with a reactor power reduction alone there may be insufficient total steam flow capacity provided by the turbine and remaining OPERABLE MSSVs to preclude overpressurization in the event of an increased reactor power due to reactivity insertion, such as in the event of an uncontrolled RCCA bank withdrawal at power. The 4 hour Completion Time for Required Action B.1 is consistent with A.1. An additional 32 hours is allowed in Required Action B.2 to reduce the setpoints. The Completion Time of 36 hours is based on a reasonable time to correct the MSSV inoperability, the time required to perform the power reduction, operating experience in resetting all channels of a protective function, and on the low probability of the occurrence of a transient that could result in steam generator overpressure during this period.

The maximum THERMAL POWER corresponding to the heat removal capacity of the remaining OPERABLE MSSVs is determined using a conservative heat balance calculation as described above (Action A.1) and in the attachment to Reference 6. The values in Specification 3.7.1 include an allowance for instrument and channel uncertainties to the allowable RTP obtained with this algorithm.

Required Action B.2 is modified by a Note, indicating that the Power Range Neutron Flux-High reactor trip setpoint reduction is only required in MODE 1. In MODES 2 and 3 the reactor protection system trips specified in LCO 3.3.1, "Reactor Trip System Instrumentation," provide sufficient protection.

C.1 and C.2

If the Required Actions are not completed within the associated Completion Time, or if one or more steam generators have ≥ 4 inoperable MSSVs, the plant must be placed in a MODE in which the LCO does not apply. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTSSR 3.7.1.1

This SR verifies the OPERABILITY of the MSSVs by the verification of each MSSV lift setpoint in accordance with the Inservice Testing Program. The ASME Code, Section XI (Ref. 4), requires that safety and relief valve tests be

(continued)

BASES

SURVEILLANCE
REQUIREMENTSSR 3.7.1.1 (continued)

performed in accordance with ANSI/ASME OM-1-1987 (Ref. 5). According to Reference 5, the following tests are required:

- a. Visual examination;
- b. Seat tightness determination;
- c. Setpoint pressure determination (lift setting); and
- d. Compliance with owner's seat tightness criteria;

The ANSI/ASME Standard requires that all valves be tested every 5 years, and a minimum of 20% of the valves be tested every 24 months. Additional test frequency requirements apply during the initial five year period as discussed in Reference 5. The ASME Code specifies the activities and frequencies necessary to satisfy the requirements. Table 3.7.1-2 allows a $\pm 3\%$ setpoint tolerance for OPERABILITY; however, the valves are reset to $\pm 1\%$ during the Surveillance to allow for drift. The lift settings, according to Table 3.7.1-2 correspond to ambient conditions of the valve at nominal operating temperature and pressure.

This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. The MSSVs may be either bench tested or tested in situ at hot conditions using an assist device to simulate lift pressure. If the MSSVs are not tested at hot conditions, the lift setting pressure shall be corrected to ambient conditions of the valve at operating temperature and pressure.

REFERENCES

1. Watts Bar FSAR, Section 10.3, "Main Steam Supply System."
2. American Society of Mechanical Engineers, *Boiler and Pressure Vessel Code*, Section III, Article NC-7000, "Overpressure Protection," Class 2 Components.
3. Watts Bar FSAR, Section 15.2, "Condition II - Faults of Moderate Frequency," and Section 15.4, "Condition IV - Limiting Faults."
4. American Society of Mechanical Engineers, *Boiler and Pressure Vessel Code*, Section XI.
5. ANSI/ASME OM-1-1987, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices."
6. NRC Information Notice 94-60, "Potential Overpressurization of the Main Steam System," August 22, 1994.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 19 TO FACILITY OPERATING LICENSE NO. NPF-90

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT, UNIT 1
DOCKET NO. 50-390

1.0 INTRODUCTION

By letter dated June 25, 1999, as supplemented December 17, 1999, the Tennessee Valley Authority (TVA, the licensee) submitted a request for changes to the Watts Bar Nuclear Plant, Unit 1, Technical Specifications (TS). The requested changes revise the main steam safety valve TS Section 3.7.1 to provide a new requirement to reduce the power range neutron flux-high reactor trip setpoints when two or more main steam safety valves (MSSVs) per steam generator are inoperable. The letter dated December 17, 1999 provided clarifying information that did not change the initial proposed no significant hazards considerations determination.

2.0 EVALUATION

In Westinghouse Nuclear Safety Advisory Letter (NSAL) 94-001, "Operation at a Reduced Power Levels With Inoperable MSSVs," January 20, 1994, Westinghouse described a deficiency in the basis for Standard Technical Specification (STS) Table 3.7.1, "Operable Main Steam Safety Valves Versus Applicable Power in Percent of Rated Power." The NSAL revised the previous assumption that the maximum allowable initial power level was a linear function of main steam safety valve capacity. The NSAL recommended the use of a more conservative equation to calculate the power range high neutron flux trip setpoint. The U.S. Nuclear Regulatory Commission (NRC) staff's Information Notice 94-60, "Potential Overpressurization of Main Steam System," dated August 22, 1994, provided this information to all holders of operating licenses or construction permits for pressurized water reactors. This issue was reflected in the development of the TS that were issued with the operating license for the Watts Bar Plant on February 7, 1996. Accordingly, the values in TS Table 3.7.1 to which power must be reduced to accommodate inoperable MSSVs have been previously determined pursuant to that guidance and are not the subject of this evaluation.

TVA's application of June 25, 1999 proposes further changes to provide a new requirement to reduce the power range neutron flux-high reactor trip setpoints when two or more MSSVs per steam generator are inoperable. The changes address a further potential main steam system overpressure condition recently identified by the Westinghouse Electric Corporation if the power level is controlled administratively under the current TS 3.7.1 requirements while operating with inoperable MSSVs, with no reduction in high flux reactor trip setpoint. Under

ENCLOSURE

this condition, if a reactivity insertion accident such as an inadvertent rod cluster control assembly bank withdrawal were to occur, the reduced available steam relief capacity may be insufficient to preclude overpressurization of the main steam system beyond the 110% design value (assuming no credit for the steam dumps and the atmospheric dump valves). TVA proposes to address this condition by making additions to TS 3.7.1 to reduce the power range neutron flux-high trip setpoints to a corresponding power level depending on the number of inoperable MSSVs.

Specifically, TVA proposes to revise current Condition A and Action A.1 to require a reduction in thermal power to less than or equal to 59% rated thermal power (RTP) for one or more steam generators (SGs) with one MSSV inoperable.

A new Condition B is added for the case of one or more SGs with two or more inoperable MSSVs. New Action B.1 requires a thermal power reduction to less than or equal to the percent RTP specified in Table 3.7.1-1 within 4 hours.

A new Action B.2 would require a reduction of the flux trip setpoint to less than or equal to the percent RTP specified in Table 3.7.1-1, when in Mode 1, within 36 hours. Table 3.7.1-1 is revised to be compatible with new Actions B.1 and B.2.

The values of the allowable power levels for inoperable MSSVs in Table 3.7.1-1 is not changed. Current Condition B and Actions B.1 and B.2 would be revised and reworded as new Condition C and Actions C.1 and C.2.

Associated changes to the TS 3.7.1 Bases would also be made.

The staff has found that the licensee's provision of a reduced neutron flux trip within 36 hours of a condition of more than one inoperable MSSV per SG ensures a timely reactor trip, thus ensuring that the secondary system pressure will not exceed 110% of its design value. Therefore, the staff finds that the proposed changes to TS 3.7.1 are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Tennessee State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 43781 dated August 11, 1999). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b)

no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Robert E. Martin, NRR

Date: March 7, 2000

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