## **Official Transcript of Proceedings**

## **NUCLEAR REGULATORY COMMISSION**

Title: Advisory Committee on Reactor Safeguards Plant Operations and Fire Protection Subcommittee Meeting

Docket Number: (n/a)

Location: Rockville, Maryland

Date: Wednesday, March 3, 2010

Work Order No.: NRC-096

Pages 1-108

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## UNITED STATES NUCLEAR REGULATORY COMMISSION'S ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

The contents of this transcript of the proceeding of the United States Nuclear Regulatory Commission Advisory Committee on Reactor Safeguards, as reported herein, is a record of the discussions recorded at the meeting.

This transcript has not been reviewed, corrected, and edited, and it may contain inaccuracies.

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1	UNITED STATES OF AMERICA
2	NUCLEAR REGULATORY COMMISSION
3	+ + + + +
4	ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
5	(ACRS)
6	+ + + +
7	SUBCOMMITTEE ON PLANT OPERATIONS AND FIRE PROTECTION
8	+ + + +
9	SUBCOMMITTEE MEETING REGARDING WATTS BAR NUCLEAR
10	PLANT UNIT 2
11	STATUS OF LICENSING AND INSPECTION
12	DOCKET NO. 50-391
13	+ + + + +
14	WEDNESDAY,
15	MARCH 3, 2010
16	+ + + + +
17	ROCKVILLE, MARYLAND
18	+ + + + +
19	The Subcommittee met at the Nuclear
20	Regulatory Commission, Two White Flint North, Room
21	T2B3, 11545 Rockville Pike, at 3:11 p.m., Harold B.
22	Ray, Subcommittee Chairman, presiding.
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24	
25	
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1	ACRS MEMBERS:	
2	HAROLD B. RAY, Subcommittee Chairman	
3	SAID ABDEL-KHALIK, ACRS Chairman	
4	J. SAM ARMIJO, ACRS Vice Chairman	
5	JOHN W. STETKAR, ACRS Member-at-Large	
6	SANJOY BANERJEE, Member	
7	MARIO V. BONACA, Member	
8	WILLIAM B. SHACK, Member	
9	JOHN D. SIEBER, Member	
10		
11	ACRS STAFF PRESENT:	
12	MAITRI BANERJEE, Designated Federal Official	
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1       P-R-O-C-E-E-D-I-N-G-S         3       3:11 p.m.         4       SUBCOMMITTEE CHAIRMAN RAY: I'm Harold         5       Ray, Chairman of the ACRS Plant Operations and Fire         6       Protection Subcommittee, for operating license review of Watts Bar Nuclear Plant Unit 2.         7       Other ACRS members in attendance are Jack         9       Sieber, who will be joining us very shortly, Mario         10       Bonaca, Charlie Brown, Sam Armijo, and Said Abdel-         11       Khalik.         12       ACRS CHAIRMAN ABDEL-KHALIK: Sanjoy just         13       arrived.         14       SUBCOMMITTEE CHAIRMAN RAY: Sanjoy         15       Banerjee is with us as well. I'm grateful for his         16       joint participation, although that accounts for the         17       Bight delay in our getting started with this         18       Subcommittee.         19       Ms. Maitri Banerjee is the Designated         19       Ms. Maitri Banerjee is the Designated         10       The Subcommittee held a public meeting         12       With the TVA on July 28th last year, followed by a         13       plant tour the same day. We also had a meeting here         14       this room in the preceding March.         15       M		4
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5 related to licensing, construction and restart of 1 2 Watts Bar Unit 2, and received comments and questions from the public. 3 After that meeting, the members visited 4 5 the NRC Region II offices on July 30th, and were briefed about the NRC inspection activities related 6 to Watts Bar Unit 2 construction, material condition, 7 8 and the controls TVA had implemented to ensure 9 quality construction. 10 The purpose of today's meeting is to get 11 an update from TVA and the NRC staff regarding issues related to the design licensing and construction 12 activities since their July meetings. The objective 13 14 of this meeting is to gather information, analyze 15 relevant issues and facts, and formulate proposed 16 positions and future actions as appropriate for 17 deliberation by the Full Committee. 18 This briefing is open to the public, the rules for participation in today's meeting were 19 announced as part of the notice of this meeting 20 21 published in the Federal Register on February 22, 2010. 22 23 We have a telephone bridge line open, and we have members of the public on the telephone line, 24 25 as we understand it. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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To minimize disturbance, the line will be kept muted from this end, that is to say, they can listen only until the last ten minutes of this meeting, to provide an opportunity to the members of the public then joining us through the bridge line who would like to make a statement or provide

A transcript of the meeting is being kept, and I request the participants of this meeting to use the microphones located in the meeting room when addressing the Subcommittee, and participants should first identify themselves and speak with sufficient clarity and volume so that they may be readily heard.

We'll now proceed with the meeting, and this indicates I should call on Masoud Bajestani of TVA, but I perceive we are going to begin with the staff presentation, is that correct?

MR. MILANO: No, sir.

20 My name is Pat Milano, I'm the Senior 21 Project Manager responsible for the Watts Bar 2 22 licensing.

I was just going to -- just in case you didn't kick it off right with regard to the agenda, I was just going to say that TVA is going to present

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comments.

7 first, followed by the staff, and then our Region II, 1 and again, Vice President for New Nuclear Generation, 2 3 Mr. Bajestani, is going to make the presentation for 4 TVA. 5 SUBCOMMITTEE CHAIRMAN RAY: Okay, and before you begin, let me say there are two things, 6 7 and this is a very short meeting, and I can't account 8 for that, other than that I'm here as scheduled. 9 So, I'm going to be moving things along, 10 otherwise who knows how long we would be here. 11 One thing has come up that we are asking 12 everybody, for at least a while, to address, it came up in a completely different context, but I note that 13 14 it seems to fit here in reviewing our past meeting 15 agendas, and minutes, and so on, and that is, how issues that arise, or have arisen under Part 21, 16 17 might be addressed in the context of Unit 2. Because of the Unit 1 ongoing operation, my guess is that 18 there's an active Part 21 program that TVA has, and 19 they are well aware of all the items that are 20 21 identified as part of that program, and you'll tell us how that's considered in the context of Unit 2. 22 23 The other thing I would say is, we did, as I review our notes, I'm reminded that we did 24 25 indicate that schedule was a concern, not a concern **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1 2	in terms of your meeting schedule, but it was a concern in terms of what effects meeting the schedule might have on the things that do concern us.
2	might have on the things that do concern us.
3	
4	I notice that in both the staff and the
5	TVA presentations there's material having to do with
6	schedule. We are interested maybe in the as I
7	say, the converse effect of schedule, not are you
8	meeting schedule, but what are the attempts to meet
9	schedule having what effects might they be having
10	on the things that do concern us.
11	And so, when you address yourself to
12	that, be mindful that, you know, that the issue in
13	our mind is the effort to adhere to and meet schedule
14	having any negative consequences on the quality of
15	the work, the start-up testing, and all the other
16	things that you have to do.
17	Unless the presentations change from what
18	I've seen before, we'll be told you are going to meet
19	schedule, and that always worries me because of the
20	fact that it's very hard to make a schedule in
21	advance of something as complex as this, that you
22	absolutely, positively are going to meet without
23	question.
24	And so, with those two things, Masoud,
25	would you want to begin then?
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1	MR. BAJESTANI: Sure.
2	Again, my name is Masoud Bajestani. I'm
3	the VP of Watts Bar Unit 2.
4	Gordon, introduction?
5	MR. ARENT: Gordon Arent, I'm the
6	Licensing Manager for Watts Bar Unit 2.
7	MR. KOONTZ: And, I'm Frank Koontz, a
8	Specialist in Engineering for Unit 2.
9	MR. BAJESTANI: Again, I appreciate the
10	opportunity to update you on Watts Bar Unit 2, the
11	status of the project, and where we are in the
12	completion. And, I'm going to address the two
13	questions that you brought up.
14	Let me address, if you want me to go
15	ahead and do that now I can do that.
16	SUBCOMMITTEE CHAIRMAN RAY: It's entirely
17	up to you.
18	MR. BAJESTANI: Okay. Under Part 21, we
19	look at any Part 21 that is applicable to Watts Bar
20	Unit 2, and we either process that through the
21	corrective action or operating experience that comes
22	to us.
23	As a matter of fact, just to give you an
24	example, it was like two weeks ago we got specific
25	Part 21 *** 3:20:17 ***, so we got the data, came
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10 1 into us, we sent it to our Procurement to evaluate 2 applicability to Watts Bar, and the material that we 3 are purchasing as we go through completion of Watts 4 Bar Unit 2, we will note this issue that was 5 identified in Part 21 through \*\*\* 3:12:03 \*\*\* is applicable to Watts Bar Unit 2. So, every Part 21 6 7 that comes in, we look at it and see whether or not 8 it's applicable. If it is applicable, obviously, we 9 take appropriate action. 10 SUBCOMMITTEE CHAIRMAN RAY: How do you 11 address the Part 21 issues that may have arisen 12 during the period prior? As I said, before I speculated, well, you 13 14 are probably tell me that you had an active program, 15 and those things are considered as well. 16 MR. BAJESTANI: What we had pointed to 17 the Watts Bar project, Watts Bar Unit 2 project, We 18 had to go look at all historical data, which Part 21 also includes one of those items that we look at. 19 Actually, there are over 30,000 items that we looked, 20 21 specifically, at historical data from back in the 22 construction days, and once Bar Unit 1 came on line, 23 and anything after Watts Bar Unit 1 came on line, and 24 looked at every one of those items, and again, 25 applicability and what do we need to do for Watts Bar **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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Unit 2
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So, every one of those items historical is picked up part of the historical data.

SUBCOMMITTEE CHAIRMAN RAY: Thank you. MR. BAJESTANI: Okay, and I'm going to cover the schedule a little bit later in the presentation, if you don't mind.

8 Real quick again, I'm going to provide 9 you a brief status of where we are on project completion. On page two, we are going to talk a 10 11 little bit about the integrated schedule, procurement, engineering, construction, 12 refurbishment. Gordon is going to talk about 13 14 licensing, and Frank is going to talk about where we 15 are on the IPE and IPEEE, and then I'll come back and 16 talk about again on the Unit 1 and 2 integration and 17 where we are on that. 18 If you turn to the next page, this is, 19 essentially, our construction completion status

20 schedule. Anything that doesn't have a date, and you 21 can see that by triangle, that's complete. Anything 22 that's got a date, those are the ones that's not 23 complete.

Again, I'm not going to go through a lot of detail here, but again, the Board approved the

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1 project August of 2007. We had the construction 2 reactivation letter, regulatory framework. We 3 developed a lead 0 schedule for the project, and we 4 started the construction in June of 2008, and we are 5 expecting to complete major engineering by end of this month, actually. 6 7 SUBCOMMITTEE CHAIRMAN RAY: Could you 8 move ahead to Slide 5 on that point. 9 MR. BAJESTANI: Certainly. 10 SUBCOMMITTEE CHAIRMAN RAY: Could you 11 reconcile what you just said with these numbers here? 12 MR. BAJESTANI: Yes. What I mean by completing the engineering -- major engineering 13 14 complete by end of March, is all the design output 15 document, which is what we call EDCRs and DCNs. 16 These are the stuff, essentially, the design output 17 document that's issued, it goes into construction, 18 and construction goes to modify the field of data construction. 19 We are still going to have a lot of 20 21 engineering staff that's going to be remaining to do 22 remaining programs, calculations, and a lot of -- we 23 have -- when we issued some of this DCR, EDCR design output document we had we called a lot of unverified 24 25 assumptions. It, specifically, says that I have to **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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13 come back on these specific calculations, or on this 1 2 specific program, remove this unverified assumption. 3 So, we have a lot of work still left after we issue 4 all the major engineering design output documents. 5 SUBCOMMITTEE CHAIRMAN RAY: Well, that's, I guess, an application of what I should understand 6 7 major engineering complete to mean, in other words, 8 the reconciliation is that what's on page five here 9 is largely other stuff. 10 But, gee whiz, these numbers are so out 11 of line with what I would think of as major 12 engineering complete this month, that it was shocking to me. 13 14 MR. BAJESTANI: I understand. 15 SUBCOMMITTEE CHAIRMAN RAY: Is this my 16 definitional problem, is that it? 17 MR. BAJESTANI: You know, from the construction perspective, construction looks at it, 18 what they need to have from engineering to be able to 19 do work. 20 21 And, really, when we say we are looking 22 at completing major engineering, it's what 23 construction needs to complete their work. 24 SUBCOMMITTEE CHAIRMAN RAY: I'm trying to 25 get this straight. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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14 MR. BAJESTANI: Okay. 1 2 SUBCOMMITTEE CHAIRMAN RAY: If you've got unverified or unconfirmed assumptions and/or 3 4 calculations, how can you release drawings for 5 construction, which may have those unverified assumptions involved? 6 MR. BAJESTANI: Okay, let me give you an 7 8 example. 9 Engineering issued a design output document to be replace a bunch of tables. Okay? 10 11 Construction takes the design output document, this goes from point A to point B. After completion of 12 this job, what we have is what we call \*\*\* 3:24 \*\*\*, 13 14 it basically says what the length of the cable is for 15 the calculation. You have to take this information back 16 17 after the work is complete, you already have some idea what it's going to be, obviously, but the actual 18 field data --19 20 SUBCOMMITTEE CHAIRMAN RAY: You are 21 looking for as-built field data --22 MR. BAJESTANI: As built. 23 SUBCOMMITTEE CHAIRMAN RAY: -- to go back 24 and compare with the initial analysis type 25 calculation. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1	MR. BAJESTANI: Exactly.
2	SUBCOMMITTEE CHAIRMAN RAY: Do all of
3	these fall in that category?
4	MR. BAJESTANI: A lot of them they fall
5	under that category, that we have to go back.
6	SUBCOMMITTEE CHAIRMAN RAY: So, it's
7	taking as built results and going back and comparing
8	them with assumptions.
9	MR. BAJESTANI: Exactly.
10	SUBCOMMITTEE CHAIRMAN RAY: Does that
11	deal with mechanical stuff, or stress type stuff?
12	MR. BAJESTANI: It deals with mechanical,
13	as well as electrical.
14	SUBCOMMITTEE CHAIRMAN RAY: And, you'll
15	be staffed to handle that
16	MR. BAJESTANI: Yes.
17	SUBCOMMITTEE CHAIRMAN RAY: with the
18	same rigor that you had when you developed the main
19	set of drawings.
20	MEMBER SIEBER: I assume things like
21	piping analysis, seismic supports, and all that, are
22	done as construction progresses.
23	MR. BAJESTANI: That's correct. Let me
24	just I wanted to I think I tried to explain it.
25	MEMBER BROWN: Well, I wanted to,
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1 relative to -- I'm not sure this is related, I think 2 this is related to what you just said, I'm not sure, 3 I'm trying to relate to the mechanical stuff. 4 Pipes go in, hangers are supposed to be 5 put in certain places, they are rarely ever where you think they might be. So, you, actually, have to lay 6 7 out, even on the mechanical side, on all the major 8 piping, the high stress piping, and, particularly, if 9 they are off then you have to redo that calculation 10 as well to determine if you still meet all the 11 requirements. 12 So, all right, I was just trying to get my handle around this. 13 14 MEMBER SIEBER: That's usually fit in the field kind of work, where the engineers actually do 15 the job. 16 17 MEMBER BROWN: This is not non-deviation type stuff, from what I remember. You don't always 18 get to the place where somebody said they were going 19 to -- they were supposed to be, for whatever reasons, 20 21 and I think that's what you were driving at. 22 MEMBER SIEBER: Right. 23 MEMBER BROWN: Okay. All right, thank 24 you. 25 SUBCOMMITTEE CHAIRMAN RAY: I hear the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

explanation. I have no reason not to accept it, it's 1 2 just getting my mind around it is a little difficult, 3 because if you had said major design work complete, 4 or something like that, maybe I'd have understood 5 better, but to me to say major engineering work complete, it's hard then to reconcile what you said 6 7 with this slide five, other than you've provided it, 8 a reconciliation, and I guess we better move on. 9 MEMBER BROWN: No, I had one other question. 10 11 SUBCOMMITTEE CHAIRMAN RAY: Sure. 12 MEMBER BROWN: If you don't mind. Some of this stuff will have more 13 14 priority than others, because if you build and 15 construct you lose access for corrective actions. Do you call try to assign to reevaluate 16 17 these various field as built type stuff to see which ones you've got to do first, is that thought process 18 involved? 19 20 MR. BAJESTANI: Yes. 21 MEMBER BROWN: The only reason ask is 22 that I worked on -- we had that problem one time, 23 we'd go back and look and they had already covered it 24 up, so it cost a lot of money to fix it. 25 MR. BAJESTANI: Yes, we look at every one **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

	18
1	of them. If there are issues that
2	MEMBER BROWN: You are going to say yes,
3	we'll go on. Harold, we've got a tight schedule.
4	MR. BAJESTANI: We'll go back to the
5	schedule.
6	I'm not going to mention major
7	engineering complete, I'm going to say some other
8	work, because I have to think about it.
9	We have submitted FSAR amendment for an
10	operating license. Some of our major upcoming
11	months, the next one is actually turbine or turning
12	gear, which is coming up October of this year, Unit
13	2, Integrated Safeguards test, we are going to do
14	this test during the next refueling outage, because
15	this test, actually, can be done only when Unit 1 is
16	shut down.
17	We are also going to do next thing is
18	primary hydro, then we are going to fill the ice
19	condenser with ice, and do the hot functional test,
20	and then ready for fuel load.
21	Any questions? Okay.
22	Next page, page four,
23	Under procurement side, this was also
24	something that we discussed last time, just real
25	quick, Bechtel oversight of procurement and supplier
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	19
1	quality. Obviously, because of some of the issues
2	that we have had in industry, specifically, on
3	fraudulent material, and counterfeit, we have
4	actually trained our QC inspectors, we have put those
5	requirements, what to look for in our process and
6	procedures.
7	And, what we have done, actually, we have
8	done over 281 visits to date, with 168 report issues,
9	and this is for different vendors that we are buying
10	the materials.
11	And, we have, actually, identified issues
12	during some of this short surveillance that we
13	brought it to the vendors' attention, and got it
14	fixed.
15	Also, the ASME QA program audit for the
16	new suppliers, again, Bechtel has done an audit.
17	And then, on top of what Bechtel is
18	doing, TVA, we have our own TVA oversight of the
19	Bechtel QA performance, and again, we, actually,
20	participate in some of the shop surveillance. We,
21	actually, go to TVA, actually, watched some of the
22	factory acceptance tests. We look at we have done
23	actual independent review of some of the receipt
24	inspections, and also audit of the ASME procurement
25	and material storage.
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1	And, we do find issues, and we fix them
2	as we go.
3	Next page, engineering. Some of the
4	stuff that we look at right at the beginning,
5	whatever we do to make sure that we maintain the
6	design margin, and if there are opportunities that we
7	can, actually, gain margin, we've been doing that.
8	Specifically, we are replacing all eight ERCW pumps,
9	these are the essential clean water measures, we've
10	got cooling water, essentially.
11	Overall, 60 percent complete, design
12	modification 64, calculations 72 percent. The CAPS
13	and special programs, which are 29 programs, over 60
14	percent complete. And, the data, as far as quality
15	of the records, is all retrievable and legible, and
16	we haven't had really any issues from the
17	construction days, nothing major.
18	Quality of the engineering, so far again,
19	what we do, we, actually, monitor the number of
20	engineering errors, number of field changes that are
21	caused by construction, because they can't implement
22	it, so we monitor all this information, and we look
23	at the trend, and feed that back into the designer to
24	make sure that we don't make the same mistakes, you
25	know, over and over.
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	21
1	Overall again, the quality of engineering
2	has been pretty good.
3	I put a few charts over here to show you
4	where we are on some of the major engineering output
5	document. This is, actually, some of the engineering
6	output documents that we issue, and you can see
7	pretty much we are staying with the schedule.
8	MEMBER BONACA: What are the yearly
9	number of EDCRs.
10	MR. BAJESTANI: Number of EDCRs, packages
11	that's issued from engineering.
12	MEMBER BONACA: Is that per week?
13	MR. BAJESTANI: That's, actually, per
14	week, per week issue number. On the left is per
15	week, and the right would be cumulative.
16	MEMBER BONACA: Cumulative, okay, good.
17	SUBCOMMITTEE CHAIRMAN RAY: So, some time
18	this month you are going to achieve a level of
19	production considerably higher than you've achieved
20	so far.
21	MR. BAJESTANI: Yes, and let me also
22	explain to you why we end up, actually, going to see
23	other engineering firms, so besides our main
24	engineering, which is Bechtel, we have gone,
25	actually, to three other major engineering, and they
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1	are doing, actually, packages for us. So, we have
2	got quite a few people to be able to accomplish what
3	we are saying here. So, this is not just Bechtel to
4	perform engineering output documents.
5	Construction, next page, overall a little
6	bit over 23 percent complete, focusing on the
7	refurbishment and bulk work. Quality of
8	construction, just give you some data, data points
9	under a number of welds that we have made so far, the
10	weld reject rate has been less than 1/2 a percent.
11	So, it's been pretty good.
12	Under critical path, safety injection
13	system, chemical and volume control system, plant
14	computer, and component cooling system, every one of
15	these systems, essentially, is tied to material right
16	now. Like for safety injection, chemical and volume
17	control system, and component cooling system, they
18	are all tied to ASME Section 3 valves that we are
19	purchasing, and they go along with material.
20	MEMBER BANERJEE: Where are those valves
21	coming from?
22	MR. BAJESTANI: They are coming from the
23	different vendors, but it's very limited, you know.
24	some of them are coming from Flow Serve, we've got
25	some *** 3:33 ***, we've got a few other companies,
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1	but they are a very limited number of suppliers.
2	MEMBER BANERJEE: I was at a meeting
3	yesterday where this was discussed by a couple of
4	Senators. It was interesting to hear that.
5	MR. BAJESTANI: Some of the ASME Section
6	3 valves, their lead time when we put the pressure
7	from the time we put the pressures over there it's
8	sometimes 52 weeks, actually.
9	We are on track to complete the
10	construction activities, and ready to go to fuel by
11	April of 2012.
12	Next page will give you some idea about
13	some of the bulk work, like the hangers. These are
14	the 7902, 7914, this is after a number of the stress
15	analysis that we have done, and the walk down that we
16	have done, we came up with a number of modifications.
17	So, this is again, this is changing as we do more
18	analysis, but this is a forecast, actually, what we
19	have to do to get all the support modifications
20	complete.
21	SUBCOMMITTEE CHAIRMAN RAY: Well, a
22	forecast of what you have to do, I understand.
23	MR. BAJESTANI: What we have to do.
24	I guess this is probably time to address
25	your second question under schedule, and, you know,
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when we developed -- when we went through the \*\*\* 3:35 \*\*\* to identify the scope, and really the schedule and budget for this project, we spent a lot of time up front, and we had close to 100 engineers that looked at the material, looked at all the calculations that we need to do, the work that we need to do.

8 We set aside a lot of contingencies, 9 essentially, for breakage, for -- to make sure, 10 bottom line, that we have for breakage, really, we 11 didn't put -- let's put it this way, I'm just going to tell you that the 60-month schedule that we put in 12 is not an idealistic schedule. There are a lot of 13 14 times that we put in for breakage issues that comes 15 in that we need to deal with.

So, besides, you know, the fact that we have oversight on oversight, okay, we stressed to everybody about the quality. Everybody understands that quality comes first. Everybody understands that at the same time we have to have a schedule. Okay.

So, the schedule is there, everybody knows what the schedule is, everybody knows what the quality is, and the thing is, everything that we do on safety related we have a QC inspection that we have to do. We have a quality assurance survey, we

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1	come back after the work is done, we sample some of
2	the work to see if even if after the work has been
3	completed to see if we still need other design specs,
4	the vendor specs, the construction specs, and then
5	the next thing is, obviously, all the testing that we
6	are going to do to prove what we have, actually,
7	installed meets the design output document with
8	respects to flows, pressure, temperature and so on
9	and so forth.
10	So, from the schedule side, and looking
11	at the quality, we are not really seeing anything
12	that's negative that tells us that the schedule is
13	the main driver, and we are getting some poor quality
14	items.
15	SUBCOMMITTEE CHAIRMAN RAY: You've got 13
16	months til the integrated safeguards testing.
17	MR. BAJESTANI: Right.
18	SUBCOMMITTEE CHAIRMAN RAY: How much flow
19	is there in the critical path to that date?
20	MR. BAJESTANI: Right now, the schedule
21	that we have, actually, that we review on a daily
22	basis, shows November of 2011. Again, we are not
23	looking at this is the present schedule, this is
24	not the 60-month schedule that we've been talking
25	about.
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	26
1	Today, if you look at where we are, and
2	how much flow we have with respect to the schedule of
3	April of 2012 for loading fuel, the schedule shows us
4	right now that we are in November time frame, 2011,
5	loading fuel.
6	SUBCOMMITTEE CHAIRMAN RAY: Let me ask
7	you about integrated safeguards testing, I'm trying
8	to follow what you are saying.
9	You are saying you can't associate any
10	float in the schedule with the critical path between
11	now and the safeguards testing. It's at the end of
12	the schedule, basically.
13	MR. BAJESTANI: Right.
14	SUBCOMMITTEE CHAIRMAN RAY: So, if that
15	date slips, you've got a problem with Unit 1, because
16	Unit 1 has got to be in an outage condition.
17	MR. BAJESTANI: That's correct.
18	SUBCOMMITTEE CHAIRMAN RAY: And, do you
19	have any float in that?
20	MR. BAJESTANI: Okay, there are things
21	that we have to do during next refueling outage.
22	Okay?
23	Integrated safeguards is one.
24	SUBCOMMITTEE CHAIRMAN RAY: Right.
25	MR. BAJESTANI: Then we have some flow
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27 1 balancing that we have to do during that time, again, 2 to require shutdown condition. So, if we can't get this integrated 3 4 safeguards test done during this refueling outage, 5 it's going to push the schedule. SUBCOMMITTEE CHAIRMAN RAY: Well, I 6 7 understand, and it's really not pertinent to the 8 things we need to be concerned about, other than as 9 this issue that you are discussing might affect 10 things that we are concerned about. That's what I'm 11 saying. 12 So, as a way of trying to get at that, I'm just trying to find out, recognizing that Unit 2 13 14 and Unit 1 have a tie at that point in time, do you 15 have any float to that point in time, on the critical 16 path? 17 It's okay if the answer is no. I just --18 MR. BAJESTANI: Well, I really can't tell you that -- the reason I'm saying that is, I haven't 19 looked at it with respect to, really, there are a lot 20 21 of systems that we have to get complete before, you 22 know, we get, obviously, to that integrated 23 safequards test. 24 And, right now, when I look at the 25 schedule, it shows that it meets -- but I can't tell **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	you exactly here's the float time.
2	SUBCOMMITTEE CHAIRMAN RAY: Okay. It's
3	that date that I would be more concerned about than
4	fuel load.
5	The issue is, when you've got something
6	else going on next door, that says I've got to be
7	ready to do this at this point in time, what's my
8	chances of being ready? That's all I'm asking.
9	And, I don't mean to belabor it. Let's
10	just go on. I'm just trying to illustrate the point
11	that I'm where I'm coming from.
12	MR. BAJESTANI: Yes, we understand that,
13	and we understand that, you know, we don't make some
14	of this dates, it is going to push and, obviously, we
15	are not going to push the refueling outage, because
16	we are going to have to go through the refueling
17	outage, it is going to be we are going to have to
18	find another window, essentially, to do this.
19	SUBCOMMITTEE CHAIRMAN RAY: Yes, either
20	that or delay the you know, back off Unit 1 until
21	you can delay the refueling date. Whatever you have
22	to do, that's your business.
23	But, it does seem, from where I'm
24	sitting, that that's the date that you are most
25	working against right now, and the question is, how
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1	much is that affecting how you get things done.
2	I would surmise quite a good deal.
3	MS. BANERJEE: Harold, if I may say
4	something.
5	SUBCOMMITTEE CHAIRMAN RAY: Sure.
6	MS. BANERJEE: We can take this as an
7	open item, or anything else that you want us to
8	follow up on, and work with the staff and the
9	applicant.
10	SUBCOMMITTEE CHAIRMAN RAY: Well thanks.
11	I don't think I want to make an open item out of the
12	schedule. That's really not our business. It's only
13	a matter that, you raise the issue of schedule, it,
14	naturally, then causes us to think about what effects
15	are the schedule having on the things that we are
16	reasonably concerned about. It's not meeting
17	schedule, that's your business, not ours.
18	MR. BAJESTANI: And again, we have other
19	options that we have to sit down internally to
20	discuss, whether or not we want to extend the
21	refueling outage. I mean, there is a whole bunch of
22	other options that we can sit down and look at.
23	SUBCOMMITTEE CHAIRMAN RAY: I understand.
24	MR. BAJESTANI: You know.
25	SUBCOMMITTEE CHAIRMAN RAY: I understand.
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1	I don't expect you to say that there's a problem
2	here. I'm just trying to use your own communication
3	to us as a way of asking the question, how seriously
4	is the schedule pressure affecting what else you have
5	to do, and it looks like it's a pretty significant
6	factor, just viewed from my far distant position
7	here.
8	So, why don't you go ahead.
9	MR. BAJESTANI: Okay.
10	MEMBER SIEBER: Well, let me just add one
11	thing.
12	Schedule pressure always is pressure on
13	the quality of work. For example, if you are rushing
14	to finish a lot of engineering jobs, what you end up
15	with is a pile of what we call ECNs, engineering
16	change notices, which is corrections of mistakes, and
17	so forth.
18	And, I think that' where the attention
19	needs to be paid, is keeping the engineering so that
20	the engineering quality is assured, and that quality
21	assurance, and quality control of the construction
22	project is appropriate for the safety level that you
23	are trying to achieve.
24	And, another way to look at it is the
25	accident, industrial accident rate of the craft
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31 1 workers. You know, you want to -- you want to look 2 at all these indicators to determine, are you getting 3 the most out of your workforce for the goals that you 4 are trying to achieve, and when you are all done do 5 you end up with a quality project. MR. BAJESTANI: Right, and that's really, 6 7 again, I keep going back to some of the quality of 8 the construction, and quality of the engineering, you 9 know, just looking at the weld rejects, we are 10 looking at industrial safety, how we are doing that, 11 we've got a whole bunch of different indicators that 12 are really telling us that the schedule pressure is not really causing, the schedule itself is not 13 14 causing adverse impact. 15 SUBCOMMITTEE CHAIRMAN RAY: That's good. MEMBER SIEBER: Okay. 16 17 SUBCOMMITTEE CHAIRMAN RAY: Tt's 18 something we want you to be aware that we are If this unit was there all by itself, 19 interested in. 20 you'd do the integrated test when you got ready to do 21 it, but you've got another unit that you've got to do 22 it when it's ready to do it, and that's a constraint 23 on what you've got to do for the reasons that Jack 24 said and so on, it introduces another factor into 25 what happens. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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MR. BAJESTANI: Next page talks about the refurbishment program. Essentially, the program is broken out into two separate procedures. One is in the active, and the other one is on the passive components.

8 On the active -- on the passive 9 components, which we have a process procedure that specifically tells you, basically, what to look for. 10 11 Here is the form, after you've done all this you look at any -- anything, basically, that tells you 12 whether or not you have any type of degradation, and 13 14 how we can -- how to mitigate it, and the bottom 15 line, at the end it comes in and you have evaluated 16 the system, and the system meets the design basis 17 requirements.

18 On the active components, again, we are replacing a lot of active components that we cited, 19 20 just based on the business case, and some of them, 21 actually, that we just can't get the parts, we 22 decided to go ahead and replace some items and 23 refurbish them. There are, what, 1,700 to 2,000 24 items that we decided just to replace, and another 25 4,000 items that we, actually, are refurbishing, and

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1	that's, basically bringing them back to the vendor
2	specifications, you know, replacing soft part
3	materials, and replacing packing, replacing whatever
4	it needed whatever material that has certain
5	requirements as far as aging and susceptible to
6	aging, we go ahead and change out to bring it up to
7	the vendor spec.
8	Gordon, on the license?
9	MR. ARENT: Again, I'm Gordon Arent, I'm
10	the Licensing Manager for Watts Bar 2.
11	We've completed the final safety analysis
12	report and the technical specifications for Watts Bar
13	Unit 2, with the exception of one subchapter, which
14	is 2.4 on hydrology.
15	Hydrology has been being reevaluated by
16	TVA for probable maximum flood.
17	You may have heard that at some of the
18	other subcommittee meetings for Bellefonte 3 and 4,
19	so we've been involved in that process, and we expect
20	to complete that for Watts Bar 2 here in March.
21	Emergency planning, we have submitted a
22	template for the emergency action levels for Watts
23	Bar 2. That was submitted in March of this year.
24	As engineering completes, we will
25	finalize set points, numbers, and things in that
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1	document, and that will be finalized here, again, in
2	March.
3	Security plan, we did submit a cyber
4	security plan for Watts Bar 2, and are currently
5	completing cyber security evaluations on Watts Bar 2,
6	in support of the new rule.
7	In addition, for the new rule on overall
8	security plan, we will make a submittal in March of
9	2010, along with the remainder of the industry.
10	Quality assurance program, we've
11	completed that. That's been in place, and again,
12	that's a program that's the same program that's used
13	on Watts Bar Unit 1.
14	Final environmental impact statement,
15	that's been submitted, and we are in the RAI, request
16	for additional information phase, and we are
17	finalizing requests for additional information, and
18	should have that completed here in March.
19	Special nuclear material license was
20	submitted in November of last year. We need that to
21	be able to acquire fuel for Watts Bar Unit 2. We
22	gave up that license originally back in the '90s for
23	Watts Bar Unit 2, so that has been submitted, and we
24	expect a site visit some time in late spring from the
25	NMSS Branch.

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35 And then as Masoud mentioned, the CAPS 1 2 and special programs, of the 29 programs we have 3 completed three of those programs, soil liquefaction, 4 concrete quality and seismic analysis, those three 5 programs have been completed, and we've got a number of programs that are currently under inspection by 6 7 the Region, as we move forward with completing both 8 engineering and construction on the site. 9 Interface remains good with the staff. 10 We've gotten a lot of assistance from them in moving 11 forward with our reviews, and we remain on track for licensing. 12 Any questions? 13 14 Okay. 15 MR. KOONTZ: I'm Frank Koontz. I'm going to cover a couple special topics, just to update the 16 17 Committee on what we did for the individual plant 18 examination. 19 You may remember, this all stems from a requirement of the NRC in Generic Letter 88-20, and 20 it was to assess whether plants had specific 21 22 vulnerability to severe accidents. 23 A lot of the requirements predated people 24 doing a lot of PRA-type analyses, but what we chose 25 to do to address this requirement was to go back and **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	do a major update to our PRA model that we had for
2	Unit 1, and we converted it to a dual unit model and
3	did an update on it.
4	Our criteria was to comply with the ASME
5	PRA standard, at least the appropriate sections for a
6	full powered risk assessment, and also comply with
7	the appropriate sections of Reg Guide 1.200 Rev. 1,
8	for the full power PSA.
9	The new model represents both Unit 1 and
10	Unit 2. It's a dual unit model. To give you an idea
11	of some of the work that was required to do that, our
12	original model was a RISKMAN model, which is a
13	proprietary code originally developed by PLG for
14	doing PSA work.
15	We converted to a CAPTA model, which is
16	an EPRI code for risk assessment, and it seems to be
17	the industry standard, it's also used within the NRC.
18	So, it enhances communications between us and the
19	Region when we have PSA-type issues, so they can see
20	what the model is and run it on their code.
21	We updated it, updated the Unit 1 portion
22	of the model. We also added Unit 2 into the model.
23	We updated the human reliability analysis. We
24	updated the systems analysis. We did a success
25	criteria update. We updated the initiating event
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database for the model. We updated the systems
models. We assured that we had the appropriate
modeling for shared systems, since we were doing a
dual unit model we wanted to make sure that we had
the common systems modeled appropriately for two
units.
We did the system dependency update. We
did a level two update. We did a data update. We
did a containment model update, using the latest
version of MAP, at least the one we had was 4.0.7,
and we did an internal flooding update.
We had a contractor do the majority of
the work. It involved over 30 of their personnel in
doing the work. We also had probably over 15 people
from the TVA staff involved, including our risk
assessment people out of Chattanooga.
We also involved our pre-op and systems
people in doing walk downs in the plant, provide data
for the model, and we involved our operations folks
when we did the human reliability analysis with
interviews and discussing procedures.
It required about 40,000 manhours worth
of work to do the update, so it's a pretty major
update.
MEMBER BONACA: These are internal
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1	events, right?
2	MR. KOONTZ: That's correct.
3	MEMBER BONACA: Okay.
4	MR. KOONTZ: The IPEs were internal.
5	MEMBER BONACA: *** 3:51 *** rates, I
6	mean, it will be on the requirements of IPEs, so you
7	have a full PRA.
8	MR. KOONTZ: Yes, this is an update to a
9	full PRA, yes.
10	What we were using it for was to submit
11	it as our individual plant examination, but it is a
12	full PRA update.
13	If you flip over to page 12, you can see
14	some of the results. I've added in here the pie
15	chart for Unit 2, just to give you an idea of some of
16	the metrics that everybody is interested in. The
17	total core damage frequency for Unit 2 turned out to
18	be 3.28E-05 per reactor year, and the large early
19	release frequencies down at the bottom of the chart
20	there, it turned out to be 2.6E-6.
21	As a comparison, the same model run on
22	Unit 1, there is a little bit of asymmetry between
23	the units. For Unit 1, the core damage frequency is
24	3.69E-5, compared to the 3.28, and the Unit 1 large
25	early release frequency is 2.69E-6 compared to the
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2 From the update, our previous model, when it was just a Unit 1 only model, the core damage 3 frequency was down around 1.26E-5, so it went up by a 4 5 factor of about 2.5, but it was a major upgrade in the area of the loss of off site power modeling. 6 We 7 implemented some new EPRI guidance in that area, 8 which divides loss of off site powers off into grid 9 centered, plant centered, and weather related, and also the internal flooding model was significantly 10 11 enhanced compared to what we had in the original Unit 1 only model. 12 SUBCOMMITTEE CHAIRMAN RAY: This is 13 internal flooding then? 14 15 MR. KOONTZ: This is internal flooding, 16 yes, central R cooling water, dmin water, pipe 17 breaks, high pressure fire protection, water, we did 18 a lot of walk downs in the plant to look at piping in 19 the rooms. 20 MEMBER SIEBER: Just running through 21 those numbers in my head, it would appear that your containment capability from Unit 1 to Unit 2 is 22 23 slightly different. 24 MR. KOONTZ: Well --25 MEMBER SIEBER: The LERFs are not in the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	same they are off by about 10 percent.
2	MR. KOONTZ: Yes.
3	MEMBER SIEBER: What's the reason for
4	that?
5	MR. KOONTZ: I'm not sure what the reason
6	for the LERF being approximately the same, but the
7	CDFs being a little bit different.
8	MEMBER SIEBER: Yes.
9	MR. KOONTZ: But, they are both about a
10	factor of 10 for the containment.
11	MEMBER SIEBER: Yes.
12	MR. KOONTZ: Right in that range.
13	MEMBER SIEBER: But, the containments are
14	identical, right?
15	MR. KOONTZ: The containments are
16	identical.
17	MEMBER SIEBER: So, I'm not sure why the
18	numbers shouldn't be identical.
19	MR. KOONTZ: Where we see the most
20	asymmetry in the model is that we have a component
21	cooling system that's shared between the units, and
22	it has three heat exchangers that have to be shared
23	between train A, train B, and then both Units 1 and
24	Unit 2.
25	MEMBER SIEBER: Okay.
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1	MR. KOONTZ: And, some of the alignments
2	there tend to be a little bit different. That may
3	also factor in to the challenges on the containment,
4	but I'd have to go back and look.
5	MEMBER SIEBER: I notice the electrical
6	seems to dominate your CDF more than I've seen in
7	other plants.
8	MR. KOONTZ: Yes, and
9	MEMBER SIEBER: Why is that?
10	MR. KOONTZ: part of that well,
11	there's three things. One we are still looking at,
12	to see why it is more dominant than what we'd seen in
13	the past, but one thing we noted is that this new
14	EPRI model does not credit recovery as much, electric
15	power recovery, as much as the old model did, because
16	it divides it off into these three categories, and
17	then it's got, depending on the initiating event,
18	different recovery factors from being able to recover
19	the off site power.
20	The second thing is, under the RISKMAN
21	model, you would have seen a larger piece of the pie
22	chart here would have said small look, particularly,
23	at like non-isolable small LOCAs, which are really
24	reactor coolant seal ruptures, and what happens in
25	this new model under CAPTA, is all of that small LOCA
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1	stuff gets shifted over into whatever the initiating
2	event was, the true initiating event. And so, our
3	small LOCAs get dumped either into loss of ERCW or
4	loss of off site power. And, those fractions of the
5	pie then grow, because they are pulling in all these
6	small LOCAs that under RISKMAN were shown separately.
7	MEMBER SIEBER: Okay. Now, you used
8	RISKMAN for Unit 1.
9	MR. KOONTZ: We use RISKMAN currently for
10	Unit 1, but this new model, under CAPTA, is both a
11	Unit 1 and a Unit 2 model, and so we will start using
12	this model for both units.
13	MEMBER SIEBER: And so, these numbers
14	reflect two different models? The numbers you told
15	us verbally.
16	MR. KOONTZ: The numbers I told you
17	verbally, I might have confused there a little bit,
18	but the core damage frequency, for example, of 3.28
19	for Unit 2, with the same Unit 1/Unit 2 model, is
20	3.69E-5 for Unit 1. So, 3.69 versus 3.28, Unit
21	1/Unit 2.
22	MEMBER SIEBER: And, both of them are
23	MR. KOONTZ: Both CAPTA.
24	MEMBER SIEBER: they are okay, they
25	are not RISKMAN is no longer involved in either
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1	one.
2	MR. KOONTZ: Right.
3	MEMBER SIEBER: Okay. Well, that would
4	be interesting to examine that in more detail.
5	MR. KOONTZ: Yes.
6	MEMBER SIEBER: But, that's really not
7	our job, but, perhaps, it's the staff's job.
8	MR. KOONTZ: Yes.
9	MEMBER SIEBER: Do you plan to have a
10	peer review?
11	MR. KOONTZ: A peer review has already
12	been conducted, and we'll talk about that on the next
13	slide, I think.
14	MR. BAJESTANI: Next slide.
15	MR. KOONTZ: Yes, we've submitted this to
16	the staff for their review already, and they've got
17	it in their hands.
18	Just to address your subject of peer
19	review, on page 13 we did conduct a peer review back
20	in November of last year. We had seven peer team
21	members. We had utilities represented, Duke Dominion
22	and Exelon had participants in the peer team. From
23	the industry, we had a Westinghouse member that was
24	in dependent of our contractor, Westinghouse turned
25	out to be our PSA contractor also. We had SAIC, and
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44 we had an independent consultant that came in to do 1 the review on the flooding. 2 MEMBER SIEBER: Okay. 3 4 MR. KOONTZ: And, we had one foreign 5 participant, Korea Power Engineering sent an individual over, and he participated in the peer 6 7 review also. 8 The peer review, they did a pre review 9 back at their place, we sent them all the system notebooks and all the documentation for the PSA, and 10 11 they spent quite a bit of time going over it. They came to the Chattanooga Corporate Office, and we 12 entertained them down there for a week, just going 13 14 through all the details and answering all their 15 questions, and then, of course, we did a post 16 review, where they went back and assessed the 17 findings. 18 Out of the ASME standard, they have what 19 they call high level requirements and supporting requirements. And, what they review the PRA to is 20 21 really the supporting requirements, the lower tier, 22 and then they can make an assessment of the high 23 level. 24 But, there's 326 supporting requirements 25 that applied to our PSA. 86 percent met -- fully met **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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45 the category 1 or 2 for risk informed submittals. 1 2 They have category 1 is lesser, and then category 2 3 is good for risk submittals to the NRC. 6 percent 4 met category 1, most of those were associated with 5 LERF, and they are more application specific, in other words, when the NRC reviews that category 1 may 6 7 be acceptable for risk informed submittals, as long 8 as you talk about LERF with respect to the actual 9 submittal you are making, the application that you 10 are going in for. 11 And, we had 8 percent where we had the 12 supporting requirements were not met. That ended up to be about 26, 11 of which were associated with this 13 14 new flooding model. And, in general, just to give 15 you an impression, the flooding model was deemed a 16 little bit conservative by the peer team, and they 17 thought that we could probably trim the flooding part 18 of the pie chart down, if we'd go in and put, you

19 know, more detail into the flooding model.

20 MEMBER SIEBER: I can testify from 21 experience from experience that flooding can be a 22 real issue.

23 MR. KOONTZ: Yes. Well, some of it was 24 interpretation. The EPRI guidance gave various pipe 25 sizes and said, use this. We thought it was

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indicating use this flow rate.

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The peer team member indicated that his impression was, is that the EPRI guidance was really saying, this would be the maximum flow for that pipe, but you can go calculate a specific flow for your plant.

And so, in some cases we over estimated the flows, you know, for the various pipe breaks.

9 The other concern he had was, is that we 10 assessed each of the pipe breaks in the various 11 rooms, and we looked at spray effects and submergence 12 effects, and we looked at the worst case pipe break 13 for where it would go in the plant. In other words, 14 it would go over the floor, over the curb, out the 15 door, down the hallway, down a stairwell.

The standard, if you read the standard, it sort of indicates that you should do that for each line break in the room, not the most bounding one.

MEMBER SIEBER: Right.

20 MR. KOONTZ: Even though it may go the 21 same place, and, you knwo, as the bounding one, so he 22 had a finding against that.

23 So, that's to give you an idea of what 24 some of the peer team findings were.

MEMBER SIEBER: Do you have the

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47 1 corrective action program for the 8 percent that the 2 peer --3 MR. KOONTZ: We put them in our PSA 4 database for improvements. We have a database, a 5 living database that we keep. MEMBER SIEBER: When will that happen? 6 MR. KOONTZ: Well, that's a good 7 8 question. Right now, I was telling Gordon this 9 morning that one of the things they are doing is, 10 they are taking this model and converting it to a 11 Sequoyah model, and as part of that effort, with 12 another contractor and the Chattanooga staff, will be doing some of these peer team improvements also, and 13 14 then rolling it back into the Watts Bar model, and I don't have a date for when that will all be 15 16 completed. 17 MEMBER SIEBER: It will be before fuel 18 load? MR. KOONTZ: I would think it would be 19 before fuel load. 20 21 MEMBER SIEBER: Okay, let's not write it 22 down as a commitment. 23 SUBCOMMITTEE CHAIRMAN RAY: As a time, 24 I'd like to see if you guys can finish up in 15 25 minutes. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	MR. KOONTZ: No problem.
2	Final peer team report was received.
3	Like I say, we did evaluate the facts and
4	observations.
5	We worked with the PRA contractor for
6	resolving the important findings before we sent it to
7	the NRC, and we talked about the over conservatism.
8	They did have some complimentary comments
9	about the model, the documentation was thorough, and
10	detailed, and organized.
11	Page 14, this is now we are off from
12	individual plant evaluation to individual plant
13	evaluation for external events. So, this would be
14	the floods from the dam, and the tornados, and
15	seismic issues, and things like that.
16	SUBCOMMITTEE CHAIRMAN RAY: And fire.
17	MR. KOONTZ: Yes, and fire is another big
18	one in external events.
19	MEMBER BANERJEE: Can I just ask you
20	about this
21	MR. KOONTZ: Sure.
22	MEMBER BANERJEE: floods, the problem
23	was the methodology with Bellefonte, right, and you
24	were going to develop a methodology which the NRC
25	MR. KOONTZ: Hydrology study.
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49 MR. ARENT: Yes, it was originally 1 2 identified during a QA inspection. 3 MEMBER BANERJEE: What are you doing about it for Watts Bar? 4 5 MR. ARENT: We, actually, went back and did a whole set of new calculations of the entire 6 7 river system. 8 MEMBER BANERJEE: Okay. 9 MR. ARENT: So, we looked at it for how 10 it would affect Watts Bar, how it would affect 11 Sequoyah, and how it would affect Bellefonte. 12 And so, we've done an aggregate calculation. 13 14 MEMBER BANERJEE: That's completed also 15 for Bellefonte now? 16 MR. ARENT: Yes, yes, and that was 17 submitted, I believe within the last week or two. 18 MEMBER BANERJEE: Oh, because we haven't 19 seen it. 20 Okay, so that answers that question. 21 What are you doing about GSI-191? MR. KOONTZ: In Unit 1, we installed some 22 23 advanced sump screens. We went from about, I'll say 24 200 square feet of sump screen area to 4,600 square 25 feet of sump screen area. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	MEMBER BANERJEE: Down stream effect,
2	what are you doing about down stream effect?
3	MR. KOONTZ: Down stream into the reactor
4	vessel? We were using the Westinghouse methodology
5	for assessing the down stream effects.
6	MEMBER BANERJEE: That's still an open
7	issue.
8	MR. KOONTZ: I understand that that's
9	still an open issue with the NRC, so we'll follow
10	that and so whatever corrective actions are
11	necessary.
12	We did, like I mentioned, we are a
13	MEMBER BANERJEE: You are a low fiber
14	plant or not?
15	MR. KOONTZ: well, Unit 2 will be,
16	Unit 1 had some 3M fire wrap installed to protect
17	some specific conduits, and they are 3M fire wraps
18	made of a sheet of stainless steel with a matted
19	material, and it's mostly vermiculite, is what it is,
20	with glue. So, that's some fiber there.
21	And then, we had some ***4:04 *** K,
22	which is a microtherm insulation that we used for
23	separation of hot pipes and conduits. And, we've
24	gone through and other than that, we are a mirror
25	insulation plant. So, all of the steam generators,
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1	and all the loop piping, is mirror insulated.
2	We've gone through and we've tried to
3	minimize ***4:04*** K to the maximum extent possible.
4	We've taken it out everywhere we can get it out.
5	And, the remaining thing that they are looking at is
6	the 3M issue.
7	MEMBER SIEBER: I understand vermiculite
8	is an EPA listed hazardous material, is that true?
9	You ought to check.
10	MR. KOONTZ: Yes, I don't know. That's
11	an interesting question. I know that they used to
12	use it as insulation in their attics.
13	MEMBER SIEBER: WR Grace Company mined it
14	in Montana.
15	MR. KOONTZ: Sodium tetraborate is what
16	we have in the ice for a pH buffer.
17	MEMBER SIEBER: Right.
18	MR. KOONTZ: And, it seems to be pretty
19	good as compared to trisodium phosphate, and some of
20	these other chemical effects the people have had.
21	MEMBER SIEBER: Yes, you are right.
22	MEMBER BANERJEE: Well, you know that
23	this issue
24	MR. KOONTZ: It's still open, we
25	understand that. We were talking with staff a little
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1	bit about it before we came in here.
2	The strainers have already been designed
3	for Unit 2, and they mirror
4	MEMBER BANERJEE: What type is it?
5	MR. KOONTZ: it's an AREVA strainer
6	design, made by PCI, one of their contractors, and
7	they consist of pancakes, they look like square
8	pancakes that are perforated screens, and they are on
9	a core tube. And so, there's multiple of these
10	pancake strainers going up the core tube, and then we
11	have various stocks that feed into it, and then go
12	then down into the sump.
13	MEMBER BANERJEE: Yes, the issue, as you
14	know, there is, of course, when you stop to block
15	these
16	MR. KOONTZ: Yes.
17	MEMBER BANERJEE: then what happens
18	is, your approach velocity
19	MR. KOONTZ: Changes.
20	MEMBER BANERJEE: changes.
21	MR. KOONTZ: Right.
22	MEMBER BANERJEE: It's no longer the
23	approach velocity into the pancake, but into the
24	whole stack.
25	MR. KOONTZ: Right.
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53 MEMBER BANERJEE: And, it's a nightmare 1 2 when you put them next to each other in a sump, you 3 know. 4 MR. KOONTZ: Right. 5 MEMBER BANERJEE: That's another issue. MR. KOONTZ: Yes. 6 MEMBER BANERJEE: \*\*\*4:06\*\*\* basically, 7 8 that people do protypic testing of these types. 9 MR. KOONTZ: Right. One of the things we did when we did our 10 11 flow testing up at the lab, is after we got the flow testing done we did sort of an unofficial test, where 12 we just took all the fiber material and everything 13 14 and just dumped it on the strainer, to see what 15 difference it would make, and we still got acceptable results, even dumping the stuff right onto the 16 17 strainers. 18 MEMBER BANERJEE: Relatively low fiber. Yes, compared to others that 19 MR. KOONTZ: have Nucon for their primary insulation. 20 21 SUBCOMMITTEE CHAIRMAN RAY: Let's move 22 on. 23 MR. KOONTZ: Okay. IPEEE, the generic 24 approach is to follow the guidance associated with 25 generic Letter 8820 supplements 4 and 5, and NUREG-**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	1407. It's a focus scope. We do a seismic margins
2	analysis to identify seismic vulnerabilities, and we
3	are using the EPRI FIVE methodology to identify the
4	fire vulnerabilities. That's the same thing.
5	MEMBER SIEBER: Now, your seismic hazard
6	analysis is complete?
7	MR. KOONTZ: Pretty close. The
8	MEMBER SIEBER: Well, the question I will
9	have is, how do you do the seismic design of piping
10	supports if you aren't sure what the frequencies and
11	magnitudes of seismic events are?
12	MR. KOONTZ: Yes. What you do in this
13	seismic margins analysis is, we go out there and we
14	identify a minimum capability, I guess they call it.
15	For example, our safe shut down
16	earthquake is around .18G, and our minimum
17	capability, our target here is we are shooting for
18	like .3G. So, what you want to do is show everything
19	is good, at least to that criteria.
20	MEMBER SIEBER: But, that's a gamble.
21	MR. KOONTZ: Well, what we found on Unit
22	1 is some of the worst case components were the
23	screen wash pumps, and they were above that
24	capability. They were .36G.
25	MEMBER SIEBER: Okay.
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1	MR. KOONTZ: So that, Unit 1 came out
2	good, they weren't able to identify anything back
3	when we did it a long time ago.
4	MEMBER SIEBER: Just so you know, it's a
5	gamble.
6	MR. KOONTZ: Yes.
7	MEMBER SIEBER: Okay.
8	MR. KOONTZ: Now, they've completed the
9	analysis for the seismic margins part, to the point
10	where they've written the draft reports, and will be
11	reviewing those internally, and getting those to
12	Gordon probably around mid month for submittal later
13	this month.
14	MEMBER SIEBER: Okay.
15	MR. KOONTZ: So, they are pretty close on
16	that.
17	The one that's coming up to the back end
18	a little bit is the EPRI FIVE methodology, and we're
19	working our way through the fire induced
20	vulnerability evaluation right now.
21	MEMBER BONACA: Yes, one comment to the
22	fire, you know, that's a pretty old standard, 1992,
23	and one concern, well, I know that the Browns Ferry
24	fire analysis does not include fire induced
25	***4:08*** of the equipment. And so, that makes it,
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1	I guess, NRC has a rule that says if you don't treat
2	that you cannot use it for licensing applications, so
3	you may want to look at it.
4	MR. BAJESTANI: Our analysis, actually,
5	we are getting ***4:08***
6	MEMBER BONACA: Very good.
7	MEMBER BANERJEE: You have no issues with
8	Appendix R?
9	MR. KOONTZ: Well, we're working through
10	all the Appendix R analyses right now, identifying
11	which cables need to be relocated, looking at manual
12	actions.
13	MR. BAJESTANI: Yes, we looked at,
14	actually, the number of the manual operated action
15	that we have on Unit 1 versus bringing Unit 2, and we
16	have decided to replace a lot of cables. We had a
17	lot of cable modified the logic and the circuits, so
18	the number that we are coming up, the number of
19	manual operated action is significantly less than
20	what we had on Unit 1.
21	MR. KOONTZ: Well, I think you gentlemen
22	have asked a lot of good questions.
23	Moving on to page 15, I think we've
24	probably covered most of this.
25	The IPEEE report will be used the Unit
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57 1 1 report will be used as a baseline for writing the 2 Unit 2 report. Like I said, we've gone through all the new analyses, and we're finishing up the FIVE 3 4 analyses right now for Unit 2. 5 We've used plant corrective action programs where they were needed. For example, we've 6 7 used the civil seismic caps results, our hanger 8 analysis update program, integrated interaction 9 program, and ESQ program. We've done walk downs over in Unit 2 in 10 11 the common areas, associated with the IPEEE, looked at fire compartments. We've looked at the ignition 12 frequencies and some of the sources in each of those 13 14 compartments. 15 Unit 1, we didn't identify any specific vulnerabilities when we did that analysis, except for 16 17 one, and it was associated with a tornado missile 18 that could enter through a construction opening that, actually, happened to be on the Unit 2 side. 19 20 So, we protected that construction opening back a long time ago, when we finished Unit 21 22 1, so it's done for Unit 2 already. So, there shouldn't be anything there. 23 And, our goal is to submit this March of 24 25 this year, for the staff for review. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	We will come back later. This is an as-
2	designed report, so in other words we are doing it on
3	our as-designed drawings, and we will come back later
4	in August of 2011 and do an as-constructed version of
5	that for the staff.
6	That's all I have.
7	Masoud?
8	MR. BAJESTANI: Okay, real quick on Unit
9	1 and Unit 2 integration. One of the lessons learned
10	that we had from Browns Ferry was staff operations.
11	Essentially, the whole operating staff did that
12	early, because we did have some we were
13	struggling, actually, at Browns Ferry getting the
14	right number of operators to help us on some of the
15	testing. So, we started this way in advance, right
16	up front, when we got the project approved, and they
17	already had hired 160 people for this for two unit
18	operations, 160 additional people.
19	MEMBER SIEBER: You are going to need
20	additional operators, right?
21	MR. BAJESTANI: Yes.
22	MEMBER SIEBER: You are going to have
23	dual unit licenses? My experience is, it takes 18
24	months to train an operator, so that should be in
25	progress now, right?
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59 MR. BAJESTANI: Yes, it is, and like I 1 2 said, you know, we, actually, started this past August of 2007. 3 4 MEMBER SIEBER: Okay. 5 MR. BAJESTANI: Just based on what we learned. 6 7 Okay, right now every department, rad, 8 engineering, operations, they are going through 9 readiness review, to get ready for the two unit 10 operations. 11 we are going to have people to come in and do an assessment, basically, look and see what we 12 are doing, especially, on the department readiness 13 14 review, and then we are, actually, going to have 15 another follow-up after that with INPO. 16 Also on the work control side of it, any 17 work, actually, any packages that we are getting 18 ready to go work in the field, if it's Unit 1 it goes to a Unit 1 work control center, if it's Unit 2, it 19 goes to Unit 2 X senior reactor operator, X operator 20 21 that we have hired to do this job. 22 Right now, we are getting ready to, 23 actually, remove some of the interface points that we had between Unit 1 and Unit 2. We are trying the 24 25 first system on non-safety related systems, going **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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through there, we have put the process and procedure in place to remove the interface point and start testing some of those components.

4 Also, on some of the meetings that we 5 have created to make sure that we talk between Unit 1 and 2, and we really are going after the right stuff, 6 7 we look at everything that we do on Unit 2 in the 8 common area on a daily basis in our plan of the day. 9 We look at every corrective action program that may 10 have some operability impact on Unit 1, or Unit 2, 11 both units, actually, they look at it.

We have a weekly meeting with the VP of Unit 1, and his Director's Board, and my Director's Board, we sit down and look at all the issues that we need to be looking ahead, and also same thing in pre op start-up having a regular meeting with chemistry and environmental.

Next page.

We are making steady progress in engineering, procurement and construction, and licensing. Refurbishment activity is going as planned.

Again, the project is on schedule and budget to support the fuel load schedule that we have.

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Again, there's a lot of lessons learned 1 2 from the industry. This is back in late '70s and 3 early '80s. We have captured all those lesson plans. 4 We have, actually, incorporated that into how we do 5 business at Watts Bar Unit 2, specifically, and corrective action program. 6 Essentially, we use the same corrective 7 8 action program that operating site uses. 9 I don't have the latest numbers, but as 10 of last time I looked at it we had over 4,000 parents 11 \*\*\*4:15\*\*\* evaluation report that we wrote on Watts Bar Unit 2 project, again, based on lessons learned 12 we have the safety conscious work environment, 13 14 specifically, employee concerns. We have exit 15 interview with everybody that leaves the site, so we can understand what the issues are, if there are 16 17 issues that we need to be dealing with, so we don't have the same problem. 18 we do that, we've got issues that require 19 some type of stop work, we have done this a couple of 20 21 times, both on the management and the QA side of it, 22 so we stop to learn and figure out what we need to 23 do, and put a plan that, basically, avoids 24 recurrence. 25 Again, and also, a lot of lessons learned **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	from the industry. Watts Bar Unit 1, Browns Ferry
2	Unit 1, 2 and 3, a lot of and the industry lessons
3	learned, we have incorporated all those, and also,
4	like I said, we have, actually, brought also input,
5	we look at how we are doing on the construction side
6	of it, and we are going to have another, I guess I'll
7	call it, assist visit with INPO as we go through the
8	rest of the project.
9	SUBCOMMITTEE CHAIRMAN RAY: All right.
10	Anymore questions or
11	MEMBER BROWN: I've got one, if you don't
12	mind.
13	Back when we were visiting in July, I
14	think it was July last year, you indicated well,
15	we asked a question about your I&C, you indicated you
16	were going to be replicating, if I read the words I
17	had written down, the construction for the same specs
18	and standard as the Watts Bar 1 ***4:16*** 21 system,
19	with identical or equivalent hardware, and that you
20	were going to make the same design change that you
21	made post operationally after excuse me, post
22	license, initial licensing.
23	And, knowing that that system was 18, 20,
24	20 years old, or whatever, it's not always easy to
25	duplicate that.
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1	I just wondered what the status was of
2	being able to get that under, is it ordered?
3	MR. BAJESTANI: Yes, it's ordered,
4	actually, it's being manufactured, and, actually, a
5	lot of parts, a lot of parts are already fabricated,
6	and there's a factory acceptance test that's coming
7	up April time frame.
8	MEMBER BROWN: Of this year?
9	MR. BAJESTANI: Yes, and we, actually, we
10	are going to notify staff, Region wants to take a
11	look at the factory acceptance test, but right at the
12	beginning of the project we did talk to Westinghouse,
13	and they, specifically, said that they can provide
14	the parts, and they have been able to deliver.
15	MEMBER BROWN: Okay, so you haven't been
16	asked to approve a bunch of exceptions, or waivers,
17	or anything like that? So it looks like you are going
18	to be able to get something relatively close? That's
19	good. That's a real plus.
20	SUBCOMMITTEE CHAIRMAN RAY: Okay. If
21	there's nothing more, I'm going to ask the staff to
22	quickly change places with you, And, while you are
23	coming up, let me say, I do have in mind that we need
24	to provide an opportunity for public comment over the
25	phone line. There's no one here in the meeting room
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1	is there signed up?
2	MS. BANERJEE: Yes, there are two people.
3	SUBCOMMITTEE CHAIRMAN RAY: On the
4	telephone line.
5	MS. BANERJEE: On the telephone line.
6	SUBCOMMITTEE CHAIRMAN RAY: I'm asking,
7	is there anybody here in the room in addition?
8	MS. BANERJEE: No.
9	SUBCOMMITTEE CHAIRMAN RAY: Okay. All
10	right.
11	So, we need to make sure we allow time
12	for public comment.
13	Please, proceed.
14	MR. MILANO: Good afternoon. I'm Pat
15	Milano, with the NRR staff, and with me on my left is
16	Mr. Raghavan, who is a Branch Chief with the
17	assigned responsibility for Licensing for Watts Bar
18	Unit 2, in the Division of Operation Reactor
19	Licensing in NRR. And, on my right is Mr. Robert
20	Haag, from our Region II office. He's a Branch
21	Chief, again, responsible for Watts Bar 2
22	construction inspection, and he's in the Division of
23	Construction Projects.
24	Today the staff's presentation is going
25	to focus on three areas, the licensing, construction,
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1	inspection, and then we are going to give a little
2	bit of information on project oversight, the last
3	part being somewhat in response to some of the
4	questions that you had during the March, 2009
5	presentation.
6	I'll try to go through this thing a
7	little faster than what I was expecting to do, just
8	to keep on schedule for you.
9	SUBCOMMITTEE CHAIRMAN RAY: Thank you.
10	MR. MILANO: Okay. I'm going to start out
11	with the review of the the current review of the
12	operating reactor licensing application.
13	As you are well aware, the history of the
14	construction licensing has been somewhat unique for
15	Watts Bar Unit 2, and we've covered most of those
16	details during the last presentation. Thus, I won't
17	repeat I will only repeat that the operating
18	license application currently before the staff was
19	originally submitted by TVA in 1976.
20	After informing the staff in 2007 of its
21	intent, and then submitting its plan in 2008 for
22	reactivation of construction from after the plant
23	having been in a deferred plant status, TVA submitted
24	a framework for licensing and construction, licensing
25	and construction completion.
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1	In addition, the Commission provided
2	direction to the staff to use the current licensing
3	basis of Unit 1 as the basis for Unit 2.
4	In March of last year, TVA updated its
5	application to support the Unit 2 application. The
6	staff also noticed this in the <u>Federal Register</u> and
7	offered an additional opportunity for hearing, and in
8	that regard there has been a request for a hearing,
9	and two contentions were admitted.
10	Now I'd like to highlight some of the
11	activities that have been taking place since our last
12	meeting.
13	SUBCOMMITTEE CHAIRMAN RAY: Are you going
14	to touch on just what the characterization of the two
15	contentions are?
16	MR. MILANO: Our Office of General
17	Counsel has asked me not to go into much detail, but
18	I will yes, they centered in the area of
19	environmental.
20	SUBCOMMITTEE CHAIRMAN RAY: Okay, fine.
21	No, I don't want to I assumed they were on the
22	public record, and I just wanted to
23	MR. MILANO: Yes, they are.
24	SUBCOMMITTEE CHAIRMAN RAY: have you
25	identify what the general character of them was.
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1	MR. MILANO: Yes, sir.
2	One contention has to do with submittal
3	of information, and that one is just it's for TVA
4	to supplement the record.
5	And, the other one has to do, basically,
6	with aquatic environment and impacts.
7	SUBCOMMITTEE CHAIRMAN RAY: Okay.
8	MEMBER BONACA: Are there pipings and
9	wire you know, cables buried on the site?
10	MR. MILANO: You mean as part of the
11	original design, are there buried piping and cables?
12	MEMBER BONACA: Yes.
13	MR. MILANO: Yes, there are some.
14	MEMBER BONACA: So
15	MEMBER SHACK: I think he means in place,
16	actually buried in the ground at the moment.
17	MEMBER BONACA: Buried in the ground.
18	SUBCOMMITTEE CHAIRMAN RAY: Let me note
19	that we've been joined by Dr. Bill Shack and John
20	Stetkar, the Subcommittee meeting next door having
21	concluded.
22	MEMBER BONACA: The question is that,
23	then there will be components that will reach 40
24	years of life physically, so the plant exhausts the
25	first 40 years of the license.
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68 MR. MILANO: Recognize that, and as TVA 1 indicated, that -- those aspects were also part of 2 the overall refurbishment review, and the 3 4 refurbishment took into account the environments in 5 addition to the various systems components, it looked at environments and the susceptibility of various 6 7 components to degradation. Those were all assessed, 8 and then the program was developed, and appropriate 9 inspections, testing, and things like that were put 10 into place, were developed. 11 That overall program that TVA indicated, that TI-216 program, is currently before the staff 12 for review, and we are, actually, very near 13 14 completion of the overall program. We just have --15 we have one minor issue that we are just waiting to supplement some information, and we should -- we 16 17 should shortly be making an overall assessment of the 18 program. From that then, as you'll hear from Mr. 19 Haag, there will be inspections of the implementing 20 21 procedures, followed by actual inspection of how the 22 program is done at the field. 23 MEMBER BONACA: All right. 24 MR. MILANO: With regard to the safety 25 reviews, in our last presentation we noted that TVA **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	had submitted the Unit 2 specific final safety
2	analysis report, FSAR is part of its updated
3	application, and this, basically, took the Unit 1 and
4	2 FSAR that was in place at the time that Unit 1 was
5	licensed, and now made it into a Unit 2 specific FSAR
6	that's now just meant for licensing for Unit 2.
7	For reference, the current licensing
8	basis of Unit 1 is supported by an updated safety
9	analysis report, USAR, which is now at Revision 7,
10	and that is the Rev 7 of that USAR is the current
11	licensing basis that we are applying our review
12	against.
13	The staff's review is fully underway, and
14	the activities, milestones, resources, and schedule
15	constraints are being managed using the Enterprise
16	project management tool with NRR.
17	As you can see by the slide, teh actual
18	changes to TVA's application have been coming in as
19	amendments to the FSAR since about April of 2009.
20	However, the first two amendments contained
21	relatively small amounts of information, or changes,
22	thus the major work before the staff, actually, began
23	with the submittal of amendment 95 on November 27th
24	of last year, through amendment 97, which came in mid
25	January. So, the bulk of our reviews began,

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basically, in about -- in teh last couple months.

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Okay, proceeding on to what -- and TVA spent a lot of time talking about its corrective action programs, just remember, these came out pursuant to the 10 CFR 5054(F) letter back in 1985, due to the staff's identification of a number of construction-related deficiencies going on with TVA system-wise.

9 And, regarding Watts Bar, well, regarding 10 TVA in general, there was a performance -- there was 11 a nuclear performance plan that came out, and each 12 one of its stations had a separate -- a separate volume, which talked about plant-specific ones. With 13 14 Watts Bar it was in Volume 4 of NUREG 1232, and it 15 was -- excuse me, it was reviewed by teh staff in NUREG 1232, Volume 4, and also there was some 16 17 carryover into the SERs, which is NUREG 0847.

18 Implementation, however, by TVA only occurred at Watts Bar Unit 1 because of TVA's 19 decision at the time to defer Unit 2. And, although 20 21 TVA has informed us that they would implement most of 22 the corrective actions as was approved for Unit 1, 23 there were several areas where TVA decided to provide the staff with different approaches, based on the 24 25 incites that they had learned from Unit 1, and also

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because of some more efficient ways of doing business.

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The staff has reviewed all those changes, along with, you know, making an assessment of what was done in the past, and, indeed, from the standpoint of program review the staff has completed its review of all the 29 corrective action and 8 special programs, and have turned them over to the Region for inspection of TVA's implementation.

10 With regard to generic communications, as 11 we've indicated in Supplement 21 of the SER that was issued last February, when I say last February I mean 12 February, 2009, there were a number of items that 13 generic communications the staff stated it would be 14 15 reviewing to determine whether the safety issues were resolved or if additional corrective actions were 16 17 needed.

18 In this regard, the staff also noted both 19 the expected action that remained open at Unit 2 for each of the generic communication items, and the 20 21 expected staff action that are currently open.

The staff found that most of the vast 22 23 majority of these items were resolved at the time that Unit 1 was licensed, and most of these pre 1995 24 25 items that do remain open currently have to do with

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1	TVA's submission of technical specifications. So,
2	when those technical specifications the technical
3	specifications are already in, as the staff reviews
4	those as part of its safety review we'll end up
5	closing out these open generic communications.
6	Also, the staff right now is focusing
7	primarily on those generally generic letters that
8	have been issued post 1995. There were 25 that the
9	staff felt were appropriate for Watts Bar Unit 2, and
10	of those all but ten are all but ten are
11	completed. We are waiting for information from TVA
12	on five of them, and five of them the staff review is
13	in progress.
14	MEMBER BANERJEE: Which are the five that
15	you are waiting for information?
16	MR. MILANO: There's actually, there's
17	information I'll give you an example.
18	TVA, with regard to pressure locking and
19	thermal binding, you know, that one, 9606.
20	MEMBER BANERJEE: Right.
21	MR. MILANO: TVA made some in 2007
22	they gave us a letter that addressed these open
23	generic communications, and told us that they were
24	going to implement the same as Unit 1.
25	However, as you heard from TVA this
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1 afternoon, certain valves they had procurement 2 problems on, so they are not going to get exactly the 3 same valves that were in Unit 1. Also, they had some 4 -- they did have some issues with Unit 1, and had to 5 do some repairs. However, what was presented to the staff wasn't complete, we didn't know -- when they 6 said they were going to do -- when they said they 7 8 were going to do the same as Unit 1, we want to make 9 sure that the review incorporated these new valve 10 designs, and also, we wanted to know more about what 11 they were, actually, going to do, based on their -based on the discovery during the Unit 1 review. 12 So, that's, basically, it. It's not a 13 14 significant amount of information, it's generally in 15 the form of clarification and updating of what was presented in 2007 for those five. 16 17 with regard to the -- TVA has already 18 discussed the fact that there was a final environmental statement that was updated to support -19 - that was updated to support the Unit 2 operating 20 21 license application, and a final environmental 22 statement, as described in NUREG-0498, was prepared by the staff in 1987, or, excuse me, 1978, to support 23 operation of both Units 1 and 2. 24 25 And then, because of the long delay in **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

74 licensing Unit 1, a supplement to the final 1 2 environmental statement for operations was prepared by teh staff in 1994, to assess changes that had 3 4 occurred since the original FES-OL was prepared. 5 You'll note that TVA is a Federal agency itself, was required to prepare an environmental 6 7 impact statement, and TVA supplemented the 8 environmental impact statement for Unit 1 and 2 to 9 assess Unit 2 operation in February of 2008, with further information on supplemental cooling and 10 11 severe accident mitigation alternatives that came in 12 in January, 2009. And, as a result, the staff has begun its 13 14 review. We are doing that with contractor support 15 from the Pacific Northwest Labs, and TVA noted that 16 in March of this month TVA's response to some RAIs 17 are due. 18 With that, it's still -- the environmental review is still progressing. 19 20 With regard to the radiological emergency 21 response plans, in Section 13.3 of the FSAR, TVA 22 states that the REP provided protective measures for 23 TVA personnel and for the health and safety of the 24 public in the event of a radiological emergency, and 25 the TVA nuclear REP contains -- is a corporate **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1	program, and it contains site-specific appendices
2	that are applicable to each plant.
3	In 1993, TVA had withdrawn excuse me,
4	TVA withdrew the REP the site-specific REP for
5	Unit 2, and then resubmitted a Unit 1 plan which was
6	approved for licensing a Unit 1.
7	Again, in the March update TVA provided
8	its template, as was indicated, which is Appendix C
9	to the REP, and has indicated that the site-specific
10	data and references were preliminary and that
11	verification would be coming in. And, with that the
12	current status is, the off-site portion of it was
13	being reviewed by FEMA. These are the state and
14	local plans. That is well underway, and we are
15	hoping to get FEMA's finding of reasonable assurance
16	on the ability of the off-site plans to be
17	implemented shortly, and the staff has continued to
18	work on the on-site portion.
19	We are nearing completion of a set of RAI
20	questions on that, but recognizing that it's not
21	questions on the overall plan, it's just they are
22	focused on, basically, the emergency action level
23	information that's specific for Unit 2.
24	Physical security plan, TVA has already
25	indicated this, you know, and this month we are
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1	expecting a new the site security plan for Watts
2	Bar to come in with changes that incorporate the
3	recent rule changes, and also provides a better
4	description of the current status of construction of
5	Unit 2 in it.
6	And, with that, the staff believes it
7	currently remains on schedule with licensing
8	activities, to support TVA's request to receive an
9	operating license in April, 2012.
10	And, subject to any further questions,
11	I'll turn over the discussion on inspection to Mr.
12	Haag.
13	Bob?
14	MR. HAAG: Good afternoon. As mentioned,
15	my name is Bob Haag. I'm the Branch Chief of Region
16	II, with oversight responsibility for Watts Bar Unit
17	2.
18	My staff, I have approximately six
19	inspectors working for me, and we are dedicated
20	strictly for Watts Bar Unit 2 activities.
21	What I wanted to do this afternoon was
22	just bring you up to date on what's transpired, as
23	far as our inspection activities personnel-wise,
24	progress that we've made, issues and things that we
25	looked at, since we briefed you back in July of 2009.
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77 Just recently, we completed our end of 1 2 cycle review for 2009 of Watts Bar 2 construction 3 activities. We followed the process very similar to 4 the ROP, where we look at it periodically, we go 5 through many of the same steps. We looked at the construction programs, and the activities that 6 7 they've implemented over the past year. 8 For the most part, our conclusion was 9 that TVA had adequate controls in place, and 10 activities that we reviewed were being properly 11 conducted. We'll be sending a letter out to TVA, 12 actually, sent a letter out signed yesterday, and we 13 14 are going to be conducting a meeting on site --15 excuse me, a meeting in the local area, to inform the 16 public of the results of our end of cycle meeting. 17 That will happen in April. 18 As far as the resources that we used back in 2009, 8,800 hours. It's not quite what we were 19 budgeted, we had 10 FTE budgeted for the project, so 20 21 we weren't -- didn't use that fully, and what we've, 22 actually, done as far as that 10 FTE allotment, I 23 mentioned earlier, I have six people working for me, the other four FTE were designated to our 24 25 instruction, inspection staff in the Region, and we **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	pull resources out of those, so that's how we divvy
2	it up.
3	And, what we ended up doing for 2009,
4	obviously, we'd be following construction activities,
5	the pace of the safety-related work really did not
6	dictate that we use the full 10 FTE.
7	We anticipate, as safety-related work
8	does increase this year, and transitioning to
9	completion of construction in 2011, towards testing,
10	we certainly will be using the full allotment of
11	resources.
12	Recently, we hired two new resident
13	inspectors for Watts Bar Unit 2. One of them was to
14	replace an individual who resigned back in October of
15	2009. The other individual was our plan was to
16	have three residents, along with a senior, and we are
17	finally getting to that full staffing level, so we
18	have four resident inspectors on site.
19	What we want to do is for that third
20	resident inspector, he will have a lead activity in
21	the pre-op testing, start-up testing, and,
22	eventually, that individual will transition over to
23	the operations staff, and that will be then
24	responsible for looking at two unit operation.
25	Our plan is to have N+1 staffing for the
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operating units for at least the initial period of time while they have dual unit operation.

We mention here that we are reviewing -currently reviewing the historical construction deficiency reports. I mention that, because that's really the last piece of items that we need to sort through and decide what we need to inspect.

8 I mentioned in previous presentations 9 where we've looked at the scope of our inspection 10 effort, and we've looked at historical allegations, 11 bulletins, generic letters, and we've factored all those into our inspection effort, construction 12 deficiency reports, which is comparable to an LER for 13 14 an operating plant, was the last piece that we are 15 currently looking into. And, once we get that done, we'll have the full scope of inspection activities 16 17 that we plan to do for Watts Bar Unit 2.

18 And then, monitoring of construction activities with the possibility of impact of Unit 1. 19 That effort has been ramping up recently, and I 20 21 think it's partly due to increased work on TVA's 22 part, particularly, on safety-related equipment and 23 interfaces, close proximity to Unit 1 equipment, 24 whether it's actually equipment or just in the 25 general vicinity, just the recognition that we need

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to spend time looking at that. That's really a dual 1 2 unit -- dual op separate. Both the Unit 1 residents 3 and the Unit 2 residents are sharing in that 4 responsibility. We are scoping out some of the 5 things that we need to do to proactively look, make sure TVA's work controls are in place, and that they 6 7 are screening those activities that have the jeopardy 8 of affecting Unit 2 and properly controlling them. 9 Some of the major inspections that we 10 have recently performed, we were monitoring the eddy current inspections for steam generators, looking 11 12 both at the inspection results, and also looking at TVA's efforts on dealing with tube indications, and 13 14 issues such as the existing plugs they have in 15 generator tubes, changing them out to a newer material. We've looked at that. We've engaged their 16 17 staff, and we understand their path going forward, and are fairly pleased with that. 18 We still have inspections left to do, to 19 finalize our inspection area there. 20 21 RCS piping, limited opportunities to look 22 at any welding on RCS piping for the most part, as 23 you saw on your visit RCS is pretty much in tact. A 24 few opportunities we do have, we are looking at that. 25 One of them was the RTD bypass manifold, where they **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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were replacing that, installing welds. We just recently did an inspection on that, and there's another upcoming activity, where they are going to be installing caps on the upper head injection nozzles on the head. We've got planned inspectors out there to look at that also.

7 We recently did an engineering inspection 8 that was back in late summer of 2009, to look at the 9 engineering processes, their programs, and we also 10 looked at some of the engineering packages. For the 11 most part, we felt like their programs were thorough, and the products that we looked at, with the 12 exception of one, were fully satisfactory. There was 13 14 one issue that we identified on like for like 15 replacement, where the implementation of that package 16 really wasn't too good, so we are going to do a 17 follow-up inspection, both to look at that issue, and 18 how they resolved it, and also to look at some of the other areas where they had limited opportunities for 19 us, just some of the functional areas we wanted to 20 21 look at, the packages weren't as many as we needed to 22 look at, so we want to go back and finish that 23 effort. 24 And, that inspection --25 MEMBER BONACA: I'd like to go back to my

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82 1 question before, because you're the right guy, you 2 are doing the inspections. 3 MR. HAAG: Yes. 4 MEMBER BONACA: And again, buried cables 5 and piping that have been in the ground now for 35 years, will be 40 years old by the time the plant 6 7 restarts. What kind of evaluation is being done of 8 this piping and cables? MR. HAAG: It would be covered under the 9 10 refurbishment program, as Mr. Milano mentioned 11 earlier. 12 TVA --MR. MILANO: Also under the maintenance 13 14 rule portion 2, because a lot of the buried piping is 15 piping that's already in operation to support Unit 1. MR. HAAG: Piping and cabling, a lot of 16 17 it is the ERCW, which is their service water, and they've got underground piping and cabling associated 18 19 with that. Going back to the refurbishment program, 20 21 what TVA has done is to look at the various 22 degradation mechanisms for equipment, components that 23 have been sitting there for 25-30 years, identifying those degradation mechanisms, and then addressing how 24 25 they are going to look at those to make sure they are **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

back to the design requirements, or doing what they need to.

So, that program has been established. 3 4 Teh staff is currently reviewing it. I'm getting 5 ahead of myself, because that's a slide later on, but I'll mention it. So, the staff is currently looking 6 7 at, have they identified all of the appropriate 8 degradation mechanisms. If it's piping, you know, 9 have they looked at piping that's either underground, 10 wedded, identified how it could be damaged, how it 11 could be harmed, and what they are doing to address 12 that.

Once the staff completes their review of the program and says, you know, if you go out and take these actions you should appropriately cover that, we will look at its implementation. We'll look at and verify they are doing the inspections that they need to do, wall thickness measurements and so on.

But, to answer your question, as far as those components with the age that they have, and how they are going to be assured that they are going to be able to perform their function, will be a refurbishment program.

MEMBER BONACA: The reason, clearly, the

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84 1 components will be 40 years old by the time you start 2 the plant, they'll be 80 years old at the end of the life of this plant. And, it could be 100 years old, 3 4 you know, that's a pretty significant commitment, and 5 anyway, it will be interesting to see how the disposition will take place. 6 7 MR. RAGHAVAN: I'm Mr. Raghaven, Branch 8 Chief of the Watts Bar Special Projects. 9 Two things. One is, we will bring up in the next meeting these additional programs, and we 10 11 will include that. \*\*\*4:46\*\*\* review, and they, 12 actually, will be more done by then, so there will be more detail. 13 14 Number two is that, some of these 15 components are already in use in the Unit 1, and they 16 are covered under the maintenance rule for the safety 17 and supply. 18 And so, whatever happens, you know, we will take the licensing program in terms of whether 19 they should be replaced every five years, or ten 20 21 years, whatever the inspection shows. 22 MEMBER BONACA: I am asking about the 23 buried pipes, so my question was that, because clearly we see that that's probably one of the issues 24 25 that is going to affect this industry the most, **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	leakage.
2	So anyway, I think you gave me a proper
3	answer, and we'll think about it.
4	Thank you.
5	MR. HAAG: Upcoming inspections, we have
6	some of the major areas we are going to be looking
7	at. We have the problem identification, resolution
8	inspection. That's a team inspection. We did the
9	PI&R inspection last year, that we go the corrective
10	action program, both from program adequacy standpoint
11	and how they are implementing it.
12	We'll do a similar inspection this time,
13	more focusing on, actually, implementation, since
14	we've looked at the program, and as mentioned
15	earlier, the program that they've established for
16	Unit 2 is very similar to the program they have for
17	Unit 1. So, it's been looked at numerous times.
18	We have an engineering follow-up
19	inspection that I mentioned, and the refurbishment
20	inspection I'll discuss later on.
21	Our preparation for system pre-op
22	testing, that's on our minds now, to make sure we've
23	got the right focus, got the right people in place.
24	We've been spending the majority of the time,
25	obviously, looking at construction inspections,
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1 making sure we have all the inspection procedures called out in our Manual Chapter 2512, which defines 2 3 the construction inspection program. We've got those 4 activities planned out, and then we are going to make 5 sure we've completed all the inspection objectives, but we recognize that, you know, pre-op start-up 6 7 testing is coming very soon, so we need to make sure 8 we've got, both the right resources and people in 9 place to be able to do that. 10 Construction scheduling, we mentioned 11 that in the past, that was a challenge from the standpoint of trying to understand the scope of TVA's 12 work on some of these activities, and when they have 13 14 been performed. 15 We've been able to better get information 16 communicated to us that would allow us to either plan 17 our inspectors, both from how long it's going to take to look at a particular area, and when it's going to 18 be able to be inspected. 19 It's still a challenge. We are still 20 21 looking at them to be able to identify some 22 particular windows on activities we need to inspect, 23 so we can make sure we have people available. 24 So, I list that still as a challenge. 25 SUBCOMMITTEE CHAIRMAN RAY: You heard the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	discussion we had about project schedule.
2	MR. HAAG: Yes. Yes, I wanted to touch
3	base on that.
4	We understand that, because we look at
5	that routinely, whether a unit is in an outage, or
6	whether they have some other production schedule, and
7	we looked at that as far as, you know, have they
8	established the right safety conscious work
9	environment, looking under that umbrella.
10	I'll give you an example of some of the
11	things that we've been looking at. During the last
12	Unit 1 refueling outage, they had a lot of they
13	had several mods they needed to install while Unit 1
14	was down. We were looking at those, both from an
15	adequacy of the installation, and also were they
16	taking the right steps, was the quality being
17	included.
18	We had one of our inspectors out t here
19	who was observing a QC inspector doing some non-
20	destructive examination testing, and we pointed out
21	it appeared, based on the circumstances, there was
22	pressure on him to get the job done. We raised that
23	up, TVA took appropriate action, so that is a concern
24	of mine.
25	SUBCOMMITTEE CHAIRMAN RAY: Okay. Let me
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1	ask you, do you do you know, and this is not a
2	question I would expect you to have an answer to, but
3	you might, if there's any float in the critical path
4	schedule to this integrated system test next April, I
5	mean, a year from April?
6	MR. HAAG: No.
7	SUBCOMMITTEE CHAIRMAN RAY: Okay. Well,
8	because it's tied to Unit 1, and because I'm sure
9	that the TVA grid needs Unit 1 for the summer peak, I
10	guess I would pick that out as something, if you'd
11	look at the hangers, for example, they are,
12	obviously, pushing up a bow wave here, and so that
13	would be what I would be concerned about in the
14	context that you just mentioned.
15	MR. HAAG: Yes. Well, I mean, there is a
16	lot of work that has to support that, safety-related
17	injection pumps, they have to be installed, all that
18	equipment, yes.
19	SUBCOMMITTEE CHAIRMAN RAY: I'm just
20	saying that, because of that, it seems self evident
21	that there has to be a lot of attention from you
22	folks to ensure that the safety conscious work
23	environment, or however you want to measure that
24	attribute, is maintained, because the consequences of
25	missing that date are pretty severe.
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89 So, the pressure to not miss it is going 1 2 to be pretty severe, and that simply means that you 3 guys have to recognize that, and do what you do 4 accordingly. 5 I mean, that clearly is MR. HAAG: Yes. an objective on our plate to monitor the safety 6 7 conscious work environment, whether, I mean, we look 8 at the employee concerns programs, are they being 9 responsive to issues. We look during our PI&R 10 We look at their staff. We question inspections. 11 their staff. Do they feel free to raise safety issues? 12 So, we try to monitor that. 13 14 SUBCOMMITTEE CHAIRMAN RAY: Whatever 15 techniques you use, you know that better than I do, 16 but I mean, like I say, they are going to have to

maintain a hanger acceptance rate twice what they'vedone recently, in order to get where they need to go.

And, that's just an example.

So, enough said.

21 MR. HAAG: Okay. Moving on to 22 refurbishment, let me just touch base on that a 23 little bit, because, you know, we were here last 24 year, you had a lot of questions as far as how is TVA 25 going to establish quality in the plant, re-establish

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1	it, verify it, however you want to characterize it.
2	And, refurbishment program, in our minds, does a lot
3	of that, as far as taking the equipment and ensuring
4	design requirements, manufacturing specs are there.
5	I talked a little about, you know, the
6	staff, NRR staff is currently reviewing their program
7	from a scope-wide, that's important so we can
8	understand if they do what's specified in their
9	scope, if they implement that properly.
10	Once the staff has accepted it, and, you
11	know, it's gone through some review and exchange of
12	information, if they implement it properly, which is
13	our job to verify it, the refurbishment program
14	should be successfully done.
15	We had an inspection procedure, a new
16	inspection procedure written for our effort there.
17	One of our very experienced inspectors drafted that,
18	worked with the NRR staff in being able to get that
19	published. That's currently out there, and we are
20	doing some inspection to that, as far as some of the
21	actual refurbishment of components, we are looking at
22	some of that, their operator valve, actuator,
23	refurbishment, and some of the small circulator pump
24	refurbishments.
25	It's really a two-phased approach, our
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inspection effort there. It's to look at scope of their activity, have they identified and included all the right components, systems, into the program, and then sample implementation, look at replacements, look at on-site refurbishment, look at areas where they are accepted as is, based on an evaluation or maybe some testing.

So, we'll take that two-phased approach, we'll implement an inspection procedure, to be able to make sure we've properly covered the bases.

I mentioned a focus on passive equipment. 11 That's because of, you knwo, the unique nature of 12 some of these passive components, and the fact that a 13 14 large majority of them they are going to accept as 15 is, based on either evaluation, certain number of 16 tests, certain number of inspections. We want to make 17 sure that they are properly doing that, and they are 18 properly, because they are sampling their inspections, their wall thickness measurements, that 19 they are looking at critical locations and factoring 20 21 in as found design into, you know, have they 22 properly, you know, looked at sufficient sample size, 23 sample locations and things like that. 24 So, we'll be spending a lot of time

25 looking at their evaluation process and what they are

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1	doing for passive components.
2	SUBCOMMITTEE CHAIRMAN RAY: You've heard
3	buried piping and cable mentioned a couple of times.
4	MR. HAAG: Yes.
5	And then, the last thing is, just some of
6	our sampling that we are going to be doing, as far as
7	implementation. We'll look both from a risk
8	perspective standpoint, and we are also looking from
9	what's the potential damage that that degradation
10	mechanism could do to the component.
11	MEMBER-AT-LARGE STETKAR: Bob?
12	MR. HAAG: Yes.
13	MEMBER-AT-LARGE STETKAR: By the way, for
14	the reporter's benefit, my name is John Stetkar. I'm
15	a member. I came in late.
16	The last bullet there says your samples
17	are being selected based on risk significance. Is
18	the implication of that also applied for passive
19	equipment, because the vast majority of risk
20	assessments don't explicitly include passive
21	components.
22	Passive components, A, and whether
23	general are considered passive component failure
24	modes, for example, spurious closure of a valve or
25	something like that.
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93 So, I was curious how that risk 1 2 significance was being -- what benchmark was being 3 used to evaluate that risk significance for the 4 sampling. 5 MR. HAAG: For the passive components, the way we've laid out our approach to scoping out 6 7 and making sure they've got passive components 8 properly included, would be to look at some systems 9 and do vertical slices. 10 MEMBER-AT-LARGE STETKAR: Okay. 11 MR. HAAG: So, we'll be able to use risk insights to be able to pick out the systems. 12 As far as the actual components within 13 14 them, you know, we are not going to look at every 15 passive component in the two or three systems, we will look at -- we'll be selective in looking at 16 17 which passive components. 18 MEMBER-AT-LARGE STETKAR: I think my 19 question was focused, though, you mentioned taking a vertical slice through systems, based on their risk 20 21 significance. 22 So, for example, the emergency diesel generators might have relatively high risk 23 significance, but they may not have very many passive 24 25 components, such that if some systems might have a **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1 relatively higher percentage of passive components, 2 but not -- may not show up as risk significant, 3 because the risk significance is based on failures of 4 primarily active equipment. 5 MR. HAAG: Yes. MEMBER-AT-LARGE STETKAR: Do you follow 6 7 me? 8 MR. HAAG: Yes. 9 MEMBER-AT-LARGE STETKAR: You know, it 10 gets back into something that -- nobody ever models 11 cables, or failures of cables, and, usually, DC 12 systems, for example, don't show up as being very risk significant, depending on what measures you use. 13 14 And yet, they may be prone to passive type failure modes. 15 16 MR. HAAG: As I mentioned, you know, 17 passive components will -- I won't say will receive 18 all of our focus, but certainly they are going to -we are going to give that a good deal of emphasis. 19 MEMBER-AT-LARGE STETKAR: 20 Sure. MR. HAAG: Because of, you knwo, the 21 22 unknown nature, and the fact that they are relied on. 23 I mean, they are not presumed to fail. 24 So, we need to look at those, need to 25 make sure -- one of the things that we struggle with **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	is for piping, to make sure areas that they go out
2	and sample they've bounded them, that they've looked
3	at the worst case conditions, that they've looked at,
4	you know, low-lying areas. If there has been some
5	water into a system where they didn't think, that
6	they've now captured that back into the program.
7	So, yes, it's got to be more than just
8	MEMBER-AT-LARGE STETKAR: I was going to
9	say, but in a sense what you are describing are,
10	primarily, deterministic test types.
11	MR. HAAG: Well, here again, what's the
12	degradation mechanism. You knwo, is it something
13	that you would expect, because it's a wedded system,
14	and it's very likely you could get corrosion versus
15	some of the degradation mechanisms that are just due
16	to handling construction.
17	Well, if it's in an area that doesn't
18	necessarily get a lot of traffic, well, it's probably
19	not going to be that type of damage. So, we'll have
20	to factor that in, too, you know, our sample size.
21	MEMBER-AT-LARGE STETKAR: Thank you.
22	MR. HAAG: So, as far as the conclusion,
23	you know, we believe, based on the inspections that
24	we've done, construction activities have been
25	properly implemented. We haven't had any significant
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1	findings of problems that we have identified, TVA has
2	been responsive in addressing those.
3	We believe we have the inspection
4	resources we need, recognizing, you know, the
5	majority of our inspection is yet to come. There's
6	still a lot of unknowns, as far as things that can
7	come up, so that certainly, you know, could surprise
8	us, but we believe we have adequate resources right
9	now.
10	We've identified, once we complete our
11	review of construction deficiencies report, we'll
12	have the scope of all the activities that we want to
13	look at identified. We've got inspectors assigned to
14	a large majority of those, so we have owners, as we
15	refer to people who we can hold responsible, to say,
16	hey, you need to look at these inspections, these are
17	your responsibility, we'll assist you in getting up
18	into the site, but you have to be, you know,
19	proactive and making sure they get done.
20	Scheduling, I think we made progress on
21	there, but that's still a challenge to be able to
22	schedule our inspections and being able to get the
23	information from TVA that we need to properly
24	schedule things.
25	SUBCOMMITTEE CHAIRMAN RAY: And, we've
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1	talked about that.
2	We are going, of course, hear the last
3	piece of the staff's presentation. We will then hear
4	comments, if any, from the public, then we'll stop
5	that and finally take comments from the members,
6	before concluding the meeting. It's now 5:00, so we
7	are now into overtime.
8	With that said, proceed.
9	MR. MILANO: Okay. All right, the last
10	part of our presentation is discussion of the
11	oversight actions at Watts Bar.
12	In our March, 2009 presentation to this
13	Subcommittee, the staff stated that senior management
14	provided guidance to the staff regarding the review
15	of the operating license application in teh form of
16	an NRR office instruction, LIC-110.
17	And, included in this office instruction
18	was the establishment of a group consisting of
19	participants from both NRR and Region II, which would
20	be established to oversee project completion,
21	In addition to this oversight role, this
22	group, called the Watts Bar Reactivation Assessment
23	Group, and I'll just refer to it as the WRAG, serves
24	as a focal point for the status of the project and
25	for coordination between the Region and the offices
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at Headquarters.

1

2 Lastly, this office instruction, LIC-110, 3 stated that the specific charter for the group, 4 including its organization and reporting 5 responsibilities, would be established prior to its implementation. And, indeed, this was done, I 6 7 indicated on here it was done in August of 2009, 8 actually, the Charter itself was signed out in July 9 of 2009, and the August meant that that's when it, actually, got started up. 10 11 With regard to the Charter itself, I'm 12 not going to go ahead and read this thing, and this Charter, which was jointly prepared or established 13 14 between the Director of NRR and the Regional 15 Administrator of Region II, both approved the Charter and established the formation of the WRAG. 16

And, in accomplishing these objectives, the Charter describes both the project priorities, the scope of activities, reporting responsibilities, and membership of the group.

As you'll see up here, the membership of the group, the Chairman is Mr. Bruce Boger, who is the Deputy Director for Reactor Safety Programs in NRR, and the Vice Chairman is Mr. Tony Gody, Deputy Director, Division of Construction Projects in Region

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II.

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-	
2	Along with along with those two
3	gentlemen, there are voting and non-voting members of
4	the panel. The voting members are members from the
5	project staffs of both NRR and Region II, along with
6	the senior resident inspector for the construction
7	site, and the other non-voting members are,
8	generally, people that we bring in depending on the
9	scope of the functions that we are going to be
10	discussing at WRAG meetings, like during the last one
11	we had a heavy focus on what we were going to do in
12	terms of vendor inspections. And, we brought our
13	organization into the WRAG meeting.
14	With regard to oversight activities to
15	date, we held our first meeting in September of 2009,
16	and another one recently in January, 2010.
17	Also, following the January meeting, the
18	WRAG met with TVA in an open in a public meeting
19	that afternoon, and we discussed a number of the
20	things that were brought up during the staff's
21	internal discussions earlier that day.
22	The last thing I'd like to mention is, is
23	with regard there is some formality within the way
24	we review things, and we track everything that comes
25	up within an action item list. We both track it for
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100 accountability, we make sure that it's a way of also 1 2 making sure that the issues are resolved, and there's an actual documentation for closure of the items. 3 4 And, with that, that concludes the 5 presentation on oversight, and it also concludes the overall staff presentation. 6 7 SUBCOMMITTEE CHAIRMAN RAY: Good, thank 8 you. 9 Well, this is, in many ways, a unique 10 effort, and so this unique oversight function is what 11 seems to me at least to be a good way of dealing with that fact. 12 13 MR. MILANO: That's correct. 14 SUBCOMMITTEE CHAIRMAN RAY: There isn't 15 any track to run on here for a lot of the issues that have to be addressed, and having a standing group to 16 17 identify, discuss and resolve them promptly is a good thing. 18 That's, indeed, correct, and 19 MR. MILANO: going back over the -- probably approaching 30 action 20 21 items that have come out of this, the majority of 22 them are as you indicated. They are things that have 23 come up because of the uniqueness of the Watts Bar 24 situation, more so than just what you'd consider to 25 be just routine activities for any type of project **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	completion.
2	SUBCOMMITTEE CHAIRMAN RAY: They will be
3	available to deal with any increasing demands for
4	action on your part that may develop as we get closer
5	to the key dates?
6	MR. MILANO: Well, that's correct, and
7	while we were while we originally contemplated
8	like having two of these meetings per year, we are
9	already finding out that that is insufficient, and we
10	are, actually, having our next meeting in May, at the
11	Region II offices, followed several months later with
12	a meeting that will be at the site, and wherein, we
13	will be able to get further direct interaction with
14	TVA.
15	So, it's coming down to about every three
16	months now.
17	SUBCOMMITTEE CHAIRMAN RAY: Okay. Before
18	we go to the public comment period, are there any
19	questions from the members on this last piece?
20	ACRS VICE CHAIRMAN ARMIJO: I don't
21	understand this voting concept as a management
22	concept on a project like this. Could you explain?
23	MR. MILANO: Basically, as an explanation
24	to it is, is as we come up with action items, and we
25	define what we want, what the issue is, and the level
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1	of effort that needs to go into it, we get the basic
2	group comes to a mutual agreement by vote as to, is
3	that the right approach, is that what we really want,
4	is that the scope of what the action is and stuff,
5	and that's what is meant by voting members.
6	ACRS VICE CHAIRMAN ARMIJO: I don't come
7	from that kind of an environment.
8	SUBCOMMITTEE CHAIRMAN RAY: You don't
9	mean majority rules, right, you mean
10	MR. MILANO: You reach technical and
11	administrative consensus in some way, and we use the
12	term voting to describe it.
13	MEMBER SIEBER: When I was in industry,
14	there was only one vote.
15	MR. RAGHAVAN: At the end of the project,
16	do you guys think all the safety issues have been
17	addressed? Is there anybody who has a reservation on
18	the safety issues, that either the WRAG meeting or
19	any other staff have anything. That's where the
20	wording comes from.
21	SUBCOMMITTEE CHAIRMAN RAY: Yes.
22	MR. RAGHAVAN: Do you believe that to be
23	a consensus. Somebody says four voted in favor, and
24	one not.
25	ACRS VICE CHAIRMAN ARMIJO: Okay, I
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1	understand.
2	SUBCOMMITTEE CHAIRMAN RAY: All right.
3	So, it's voting, not in a majority rules term, but a
4	detailing term, if I can put it that way.
5	All right. Now, we have, we believe, one
6	or more members of the public on the line. We are
7	going to open it now and ask the first one to speak,
8	be recognized, and provide us their comments, and
9	then when that's done we'll ask if the next person on
10	the line wishes to make any further comments and so
11	on.
12	So, let me ask Maitri, is the line open
13	at this time for comments from the public?
14	MS. BANERJEE: It should be, I can go and
15	verify.
16	SUBCOMMITTEE CHAIRMAN RAY: I'll assume
17	it is, subject to checking, and ask the first person
18	who wishes to speak to please identify yourself and
19	provide us any comments that you have.
20	My perception is that the line isn't yet
21	open from the other end, but it soon will be, so just
22	stand by.
23	MS. BANERJEE: The line is open.
24	SUBCOMMITTEE CHAIRMAN RAY: Okay. I am
25	told the line is open, so again, let me ask the first
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1	person, member of the public who has been
2	participating with us, to please identify yourself
3	and give us any comments you have.
4	Well, perhaps, we've overrun the time
5	they wished to spend with us. I'll ask again one
6	more time before we move on, is there any member of
7	the public on the open phone line who wishes to make
8	any comment at this time?
9	We managed, I guess, to extend the time
10	beyond the patience the public member had.
11	So now with that, we'll, as usual, go
12	around the table here to see if any of the members
13	can help us come to some conclusion, based on the
14	Subcommittee meetings, so we can capture that for the
15	minutes that will be prepared.
16	Jack?
17	MEMBER SIEBER: I'd like to thank the
18	people from TVA and the staff, particularly, Region
19	II, for participating.
20	I, actually, have no questions or
21	comments beyond the questions that I asked during the
22	presentation to offer.
23	SUBCOMMITTEE CHAIRMAN RAY: Sanjoy?
24	MEMBER BANERJEE: I'd like to join Jack
25	in thanking the staff and TVA for a very interesting
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1	presentation.
2	I would like to see the hydrology work,
3	which I think the staff has now. It has a bearing,
4	not only on Watts Bar, but also on Bellefonte.
5	I don't think I have any other immediate
6	comments.
7	SUBCOMMITTEE CHAIRMAN RAY: All right.
8	John?
9	MEMBER-AT-LARGE STETKAR: Nothing,
10	thanks.
11	SUBCOMMITTEE CHAIRMAN RAY: Sam?
12	ACRS VICE CHAIRMAN ARMIJO: Very tight
13	schedule. That's all I can say.
14	SUBCOMMITTEE CHAIRMAN RAY: Said?
15	ACRS CHAIRMAN ABDEL-KHALIK: I have no
16	comments.
17	SUBCOMMITTEE CHAIRMAN RAY: Charlie?
18	MEMBER BROWN: None from me.
19	SUBCOMMITTEE CHAIRMAN RAY: Mario?
20	MEMBER BONACA: I have already expressed
21	my thoughts.
22	SUBCOMMITTEE CHAIRMAN RAY: As have I. I
23	will just say that I believe that the I know,
24	having been through this a couple of times myself,
25	there comes a time when the regulator says, all
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1	right, show me your schedule for getting from where
2	you are now to where you say you are going to be at
3	time X in the future, and demonstrate that that's
4	something that you can do, so that I can plan what I
5	need to do.
6	And, that's the time that I have in
7	mind is, like I said, 13 months away, so it's not
8	overdue, but before too long it's going to be
9	appropriate, I think, to take a look at what the
10	go work to that critical milestone.
11	MEMBER SIEBER: Right.
12	SUBCOMMITTEE CHAIRMAN RAY: I don't view
13	fuel load as a critical milestone, fuel load will get
14	loaded when it gets loaded. That's no big deal.
15	But, when you've got to plug in to an
16	adjacent unit, and that unit can only have an outage
17	at a particular time window, that then becomes a big
18	deal, and you need to know what the to go work is
19	starting in the next few months until you get there,
20	would be my only further comment.
21	And, the reason is, not because I have
22	any burden for meeting the schedule, it's because of
23	the impact that schedule can have on the other things
24	that we need to do.
25	Okay, no other comments, we'll stand
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		107
1	adjourned.	
2	(Whereupon, the above-entitled matter w	vas
3	concluded at 5:15 p.m.)	
4		
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## TENNESSEE VALLEY AUTHORITY WATTS BAR NUCLEAR PLANT UNIT 2

TVA

I RITIN

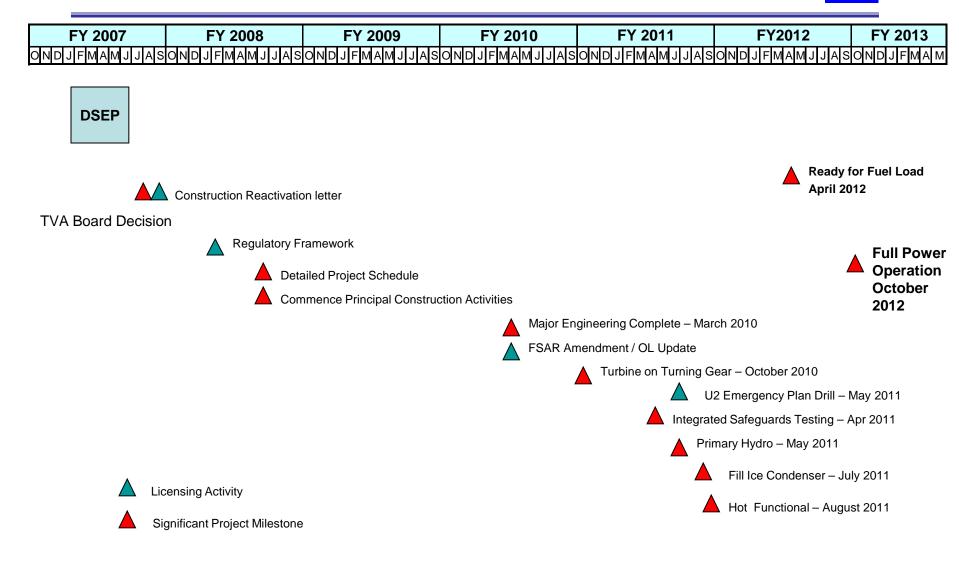
#### Advisory Committee on Reactor Safeguards

March 3, 2010

## Agenda



- Construction Completion Status
  - Integrated Schedule
  - o Procurement
  - o Engineering
  - $\circ$  Construction
  - o Refurbishment
  - o Licensing
- Special Topics
  - Individual Plant Examination (IPE)
  - IPE External Events (IPEEE)
  - Unit 1 and Unit 2 Integration
- Conclusion
- Questions

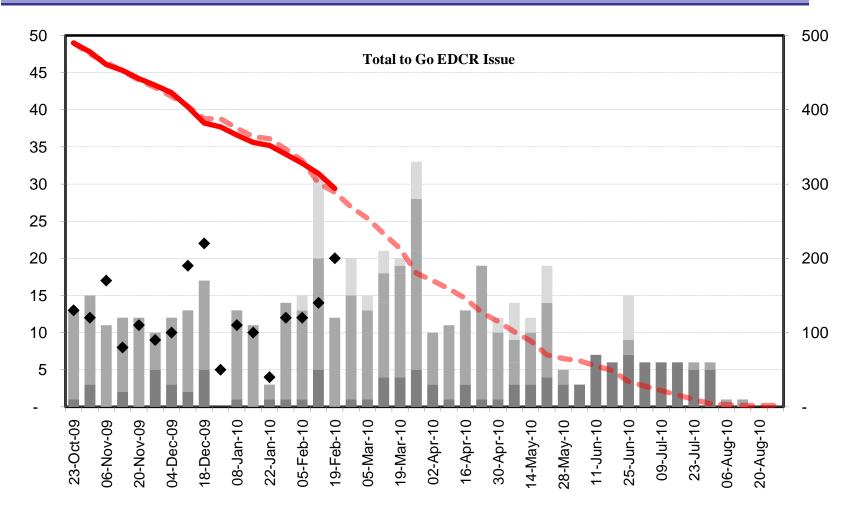


#### Procurement

- Bechtel Oversight of Procurement and Supplier Quality
  - Shop Surveillance Program
    - Surveillance Reports
      - 281 visits to date
      - 168 reports issued
  - o Training for Counterfeit / Fraudulent Material
  - ASME QA Program Audits for New Suppliers
- TVA Oversight of Bechtel QA Performance
  - Participate in source surveillances
  - Independent review of receipt inspections
  - Audit of ASME procurement and material storage

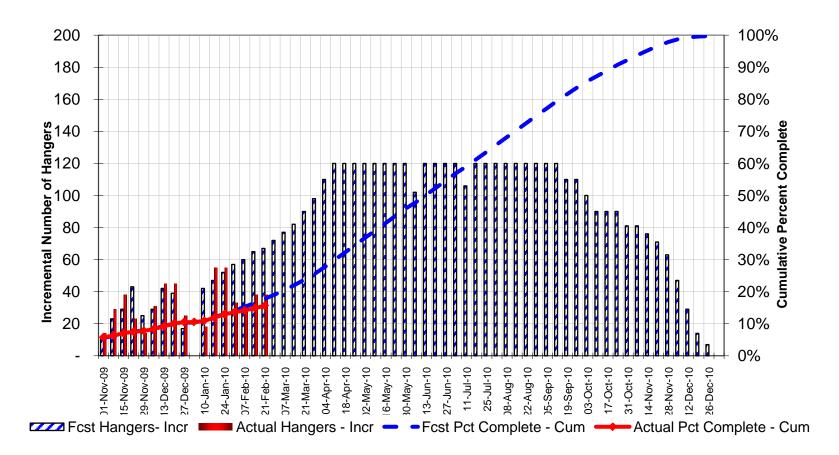
#### Engineering

- Two Unit Operations with margin
- Overall Progress ~ 60% complete
  - Design Modifications ~ 64% complete
  - Calculations ~ 72% complete
  - Corrective Action Programs and Special Programs ~ 60% complete
- Historical Design Basis Quality Records
  - Retrievable, Legible, Usable
- Quality of Engineering

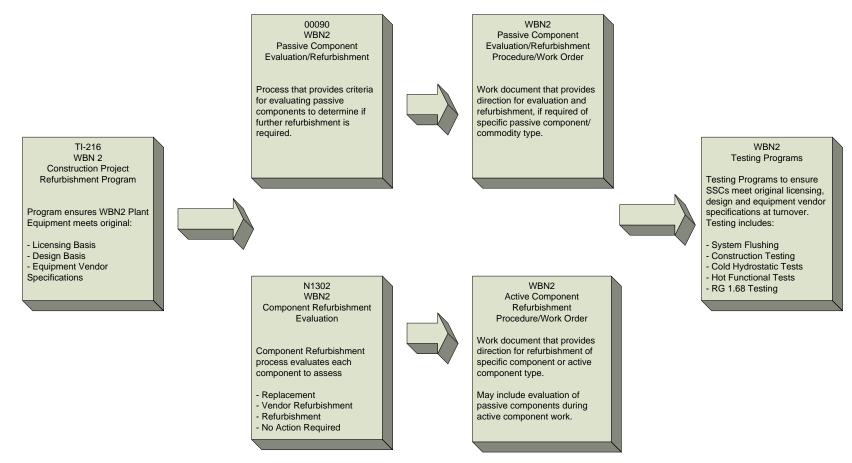


- Construction
- Overall Progress ~ 23% complete
- Construction Focus Areas
  - o Refurbishment Activities
  - o Bulk Work
- Quality of Construction
- Critical Path
  - o Safety Injection System
  - o Chemical and Volume Control System
  - Plant Computer System
  - Component Cooling System
- On Track to Complete Construction Activities to Support Current Fuel Load Schedule - April 2012

Hangers



#### **Refurbishment Program Overview**



#### Licensing

- Overall Progress
  - Final Safety Analysis Report / Technical Specifications Complete
  - Emergency Plan Template Submitted
  - o Security Plan
    - Cyber Security Submitted
    - New Rule Update March 2010
  - Quality Assurance Program Complete
  - Final Environmental Impact Statement Submitted
  - Special Nuclear Material License Submitted
  - Corrective Action Program and Special Program Closure Criteria Established – Inspections in Progress

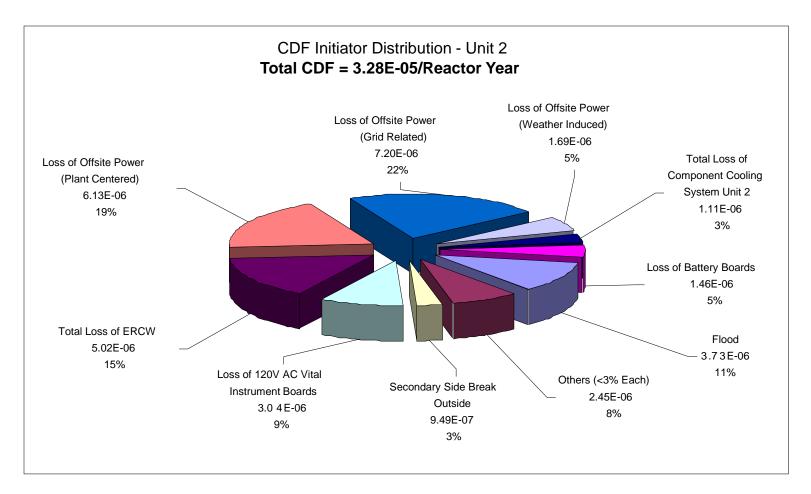


Individual Plant Examination (IPE)

- Probabilistic Risk Assessment Dual Unit Model
- Key Development Documents
  - ASME Standard
    - Addenda to ASME/ANS RA-S-2008 Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications, ASME/ANS RA-Sa-2009, February 2009.
       Defines PRA capability requirement criteria
  - o RG 1.200 Rev 1
    - An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities, Regulatory Guide RG 1.200, Rev. 1, January 2007.

Appendix A provides the NRC clarifications and qualifications for the ASME PRA Standard





U2 LERF = 2.62E-6



- Findings/Enhancements
  - Peer Review Conducted 11/09
  - The peer review covered a total of 326 supporting requirements.
    - 9 not applicable to the WBN PRA.
    - 272 or 86%, rated as supporting requirements met, Category I/II, or greater.
    - 19 or 6%, rated as met, Category I
    - 26 or 8%, rated as not met.
  - Disposition and resolution of Facts/Observations evaluated and changes in progress
  - Peer team concluded PSA meets ASME/ANS PRA standard and that
    - Documentation is very thorough, detailed and well organized
    - Processes and tools are at the state of the technology
    - Qualitative assessment of the sources of modeling uncertainty for the Level 1 model is very comprehensive and well documented



IPE External Events (IPEEE) General Approach

- Key Documents
  - NUREG-1407, Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities
  - Generic letter 88-20, Supplements 4 and 5, Individual Plant Examination Of External Events For Severe Accident Vulnerabilities
  - Deterministic Seismic Margin Approach (EPRI NP-6041, Electric Power Research Institute, "A Methodology for Assessment of Nuclear Power Plant Seismic Margin," Revision 1, August 1991.)
  - FIVE Methodology for Fire (EPRI TR-100370 Electric Power Research Institute, "Fire-Induced Vulnerability Evaluation (FIVE)," Final Report, April 1992.)



**IPEEE General Approach** 

- Utilized WBN Unit 1 IPEEE Report as Baseline
- WBN2 approach for IPEEE will closely follow the approach used for WBN1
- WBN2 Implements same Corrective Action Programs used on WBN1
- WBN1 IPEEE program indicated no vulnerabilities and included only 1 modification for tornado wind (applicable to WBN1 and WBN2)
- Results for WBN2 are expected to match WBN1, with no vulnerabilities anticipated

Schedule

- IPEEE Design Phase Report Submittal March 2010 Final
- Submittal As Built Validation August 2011



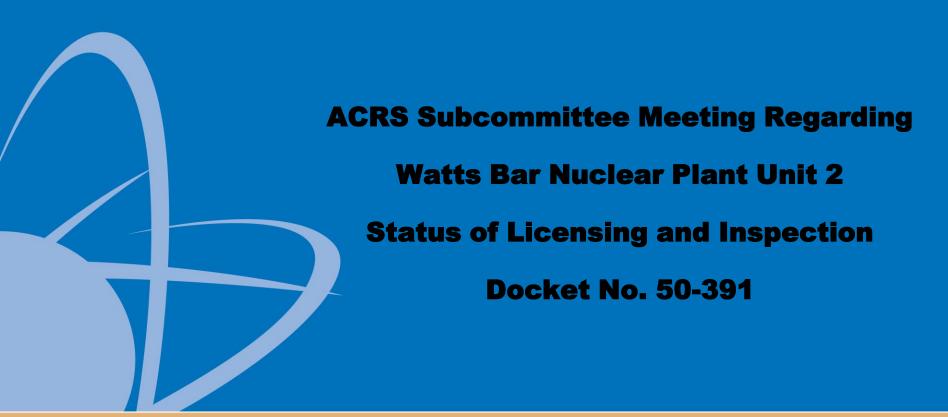
- Unit 1 and Unit 2 Integration
  - o Staffing
  - o Department Readiness reviews in progress
  - INPO Visit and Follow-up
  - o Work Control
    - Work Orders reviewed by experienced Operations personnel
    - Work on Common systems uses WBN Unit 1 processes
  - o Interface Removal for Testing
  - $\circ$  Meetings
    - Work in operating spaces reviewed daily
    - Problem Evaluation Reports (CAP) reviewed for operability by Operations personnel
    - Weekly with VP and direct reports
    - Chemistry/Environment with Preoperational Test



- Steady Progress in Engineering, Construction and Licensing
- Refurbishment Activities will ensure plant meets original licensing, design and equipment vendor specifications
- Project is on Schedule and Budget to Support Current Fuel Load Schedule - April 2012
- Stop work when it is required
- Appreciate Opportunity to Address ACRS on WBN Unit 2 Progress



## QUESTIONS



March 3, 2010



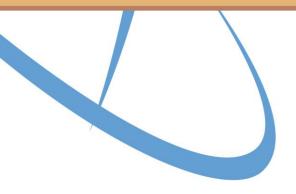
Protecting People and the Environment





- Licensing
- Construction Inspection
- Project Oversight

#### **NRR** Presentation of **Status of Licensing Activities**





Protecting People and the Environment



#### **Review of Operating License Application**

- Original Operating License Application Sept 1976
- TVA Update of OL Application March 2009
- Staff Review Status



## **Safety Evaluation Report Topics**

- TVA amendments to FSAR received
- Staff review in progress
- Project schedule managed with EPM
- Amendment Status
  - A92: Baseline FSAR for Unit 2
  - A93 April 09: preparation of SER inputs
  - A94 Aug 09: TVA responding to staff RAIs
  - A95 Nov 09: product review complete
  - A96 Dec 09: I&C platforms assessing completeness
  - A97 Jan 10: product review underway



## **Corrective Action Programs**

- Developed in 1985 in response to NRC letter regarding indentified construction deficiencies
- 29 Corrective Action and Special Programs
- Staff completed program reviews
- Inspection of implementation



## **Generic Communications**

- Approach to review
  - Reviews completed during licensing of Unit 1 (pre-1995)
  - Pre-1995 items reviewed with applicable SER sections
  - Items issued after 1995 separately reviewed
- Status of generic communications in SSER 21
- Recent focus on evaluation of Post-1995 items
- Status of NRR review post-1995:
  - Review completed 25
  - Waiting for information from TVA 5
  - NRC Review in progress 5



### **Final Environmental Statement**

- NUREG-0498, Final Environmental Statement
  - Related to operation of Watts Bar 1 and 2, December 1978
  - Supplemented in 1994 for Unit 1 operation
- TVA Final Supplemental EIS, February 2008 and January 2009
- Status of review
  - September 2009, notice of intent to prepare supplement to FES-OL for Unit 2 and conduct a scoping meeting
  - October 2009, public meeting near the site regarding environmental scoping process and to obtain comments
  - Contractor support for Draft supplement from PNNL
  - March 2010, TVA response to RAIs (non-SAMA)



## Radiological Emergency Plan (REP)

- Section 13.3 of SER
- TVA WBN REP submitted as a "site plan" in January 1982
- Having withdrawn the WBN REP submitted in 1982, TVA resubmitted WBN REP in February 1993 - reviewed only on Unit 1
- Supplement 20 to SER, February 1996
  - Includes FEMA findings
  - Concludes that requirements for full power license to Unit 1 met.
- Status
  - Awaiting FEMA finding on off-site planning
  - Staff RAI on onsite planning in preparation



### **Physical Security Plan**

- Currently approved site security plan
- Plan revisions in March 2010
  - Incorporate rule changes
  - Better description of the status of Unit 2





 Staff remains on-schedule with licensing and inspection activities to meet TVA's request to receive an OL by April 2012 **Region II Presentation** of Status of Construction **Inspection Activities** 





Protecting People and the Environment



### **Inspection Activities**

- Completed 2009 End of Cycle review
  - construction programs and activities properly implemented
  - effective controls were in place
  - no significant performance issues were identified
- RII expended 8837 staff hours on the project in FY09
- Two new Resident Inspectors selected (total of 4 construction residents)
- Reviewing ≈ 200 historical Construction Deficiency Reports for inspection applicability
- Monitoring construction activities for impact on Unit 1



## **Inspection Activities (Cont.)**

- Major inspections performed:
  - S/G eddy current
  - RCS welding for RTD bypass manifold replacement
  - Engineering
- Upcoming inspections:
  - PI&R
  - Engineering follow-up
  - Refurbishment
- Prepare for system preoperational testing (IMC 2513)
- Construction scheduling information improving but still a challenge



## **Refurbishment**

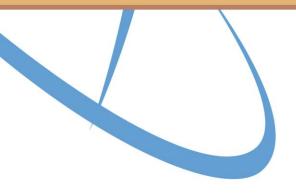
- Staff reviewing TVA's Refurbishment Program
- Inspection Procedure 37002 Issued
- Two phased inspection approach:
  - Verify required SSCs scoped into program
  - Sample a variety of implementation activities
- Focus on passive components
- Samples selected based on risk significance and potential damage from degradation mechanism



### **Conclusions**

- Construction activities properly implemented; no significant inspection findings
- RII has adequate inspection resources
- Required inspections have been identified
- Number of inspections has increased consistent with increase in safety-related construction activities
- Scheduling inspections based on TVA's construction schedule remains a challenge

### Oversight of Watts Bar Unit 2 Activities





Protecting People and the Environment





- Watts Bar Unit 2 Reactivation Assessment Group
- Established by charter in August 2009





- WRAG Charter Objectives
  - To provide oversight and management direction to determine whether the required actions have been reviewed by the staff, implemented successfully by TVA, and the staff's findings and conclusions prepared to ensure that Unit 2 meets all the relevant regulatory requirements and can be safely operated.
  - Make a recommendation to the Director of NRR and Regional Administrator, Region II, at the appropriate time, whether the activities discussed in NRR Office Instruction LIC-110 and NRC IMC 2517 have been successfully completed.



### **Oversight – WRAG Membership**

Chairman:	Bruce Boger, Deputy Director for Reactor Safety Programs, NRR
Vice Chairman:	Anthony Gody, Deputy Director, Division of Construction Programs, Region II
Voting Members:	Project staff from NRR and Region II
	Senior resident Inspector
Others:	As needed



## **Oversight - WRAG Activities**

- Met in September 2009 and January 2010
- Held meeting with TVA on January 12, 2010
- WRAG Action Item Lists being tracked, resolved, and documented for closure