



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

June 13, 2000

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of	)	Docket Nos.	50-259	50-390
Tennessee Valley Authority	)		50-260	50-391
			50-296	50-438
			50-327	50-439
			50-328	

TENNESSEE VALLEY AUTHORITY (TVA) NUCLEAR QUALITY ASSURANCE (NQA)  
PLAN - (TVA-NQA-PLN89-A) - PROPOSED REVISION - PLANT OPERATING  
REVIEW COMMITTEE (PORC) AND PLANT REVIEWS STANDARDIZATION

This letter is in response to the NRC's questions presented during  
a May 8, 2000 telephone conference regarding the subject revision  
that was submitted April 25, 2000.

Enclosure 1 contains the NRC questions and TVA's response to these  
questions. Enclosure 2 contains revised NQA Plan pages made to  
address the NRC questions.

If you have questions regarding this response, please call  
R. M. Brown at (423) 751-7228.

Sincerely,

*for* Mark J. Burzynski  
Manager  
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Enclosure  
cc: See page 2

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cc (Enclosure):

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**ENCLOSURE 1**

**Tennessee Valley Authority**

## RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

### QUESTION:

1. PORC membership for each site is currently composed of senior site managers. The submittal proposes to revise PORC membership requirements to reflect site functional areas.

The revised NQA Plan should explicitly address the collective competence of the committee, as described in section 4.3.1 of ANSI N18.7-1976.

In addition, pertinent experience and qualifications of individual PORC members, commensurate with the importance of this committee, should be addressed.

### RESPONSE:

As specified in Table 2 of the NQAP, Appendix B, TVA is presently committed to Regulatory Guide 1.8, April 1987, Personnel Selection and Training, Revision 2, which endorses ANSI 18.1-1971 and ANSI/ANS 3.1-1981 with exceptions as stated for unit staff qualifications. To address the NRC question, the opening paragraph of Section 9.9.2.B has been revised by the following addition. PORC members shall meet the experience requirements of ANSI N18.1-1971 and ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, April 1987, "Qualification and Training of Personnel for Nuclear Power Plants," as outlined in Appendix B of this plan. This applies to the correlated ANSI N18.1-1971 and ANSI/ANS 3.1-1981 Manager or Supervisor position for the represented organization. (Operations representatives who hold or who have held SRO licenses at the station are considered qualified.) This addition maintains the equivalent qualification requirements for PORC members as the current QA Plan. A copy of the revised section 9.9.2.B is enclosed.

### QUESTIONS:

2. The stated objective of the submittal is to eliminate existing site-unique requirements to establish standard requirements for plant and PORC reviews. The basis for elimination of each review item common to the three sites should be provided with a description of how the item is alternately dispositioned.
3. A general basis should be provided addressing why elimination of site-specific requirements will not reduce plant safety.

### RESPONSE:

The items from both the common and plant-specific review lists were removed to achieve consistency with the requirements of standard technical specifications (NUREGs 1431 and 1433) and NUREG 0800 for plant reviews. TVA has evaluated the removal of

these items and concludes that their removal has no effect on nuclear safety. Removal of common and site-specific review items was based on the following:

- The item is reviewed under Regulatory Guide 1.33 as specified in Section 9.9.2.B.7.a of the plan, or
- The item was eliminated from another nuclear utility's PORC review under an NRC-approved SER (Fitzpatrick - NRC Regulatory Issues Summary 99-02), or
- The item is below the threshold of PORC review and is reviewed by an independent qualified reviewer as described in Section 9.9.2.A.4 of the plan. This is consistent with Section 5.5 of NUREGs 1431 and 1433, or
- The item was redundant and is now reviewed as a standard review item that is defined in the independent review program.

**ENCLOSURE 2**

**Tennessee Valley Authority**

- h. Process Control Program Implementation (radwaste packaging and shipping);
  - i. In-Plant Radiation Monitoring and
  - j. Quality Assurance Program for effluent and environmental monitoring, using the guidance contained in Regulatory Guide 4.15 December 1977, or Regulatory Guide 1.21, Revision 1, 1974 and Regulatory Guide 4.1, Revision 1, 1975.
3. Procedures required by Section 9.9.2.A.2, procedures and programs required by site-specific technical specifications, other procedures which affect plant nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared and reviewed in accordance with approved administrative procedures prior to implementation except as specified in Section 9.9.2.A.6.

Procedures or procedure changes shall be reviewed by a qualified individual knowledgeable in the subject matter other than the preparer. The reviewer may be from the same or different organization. Procedures not reviewed by PORC shall be approved by the responsible management in accordance with established program requirements. Procedures reviewed by PORC shall be approved by the Plant Manager or designee.

4. Qualified Reviewers responsible for reviews performed in accordance with Section 9.9.2.A.3 shall be designated and qualified. Qualifications of qualified reviewers shall be as specified in written procedures. Such reviews shall include a determination of whether additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by review personnel of the appropriate discipline.
5. Procedures and intent changes to these procedures shall be reviewed to determine whether an unreviewed safety question is involved pursuant to 10 CFR 50.59 and approved administrative procedures. Items 9.9.2.A.2.c and d are not subject to the 10 CFR 50.59 review, as they are governed by 10 CFR 50.54(p) and (q) respectively.
6. Temporarily approved changes to procedures of Section 9.9.2.A.2 shall be made in accordance with ANSI N18.7-1976/ANS 3.2, as modified in Appendix B of this Plan. Such changes shall be documented, reviewed, and approved in accordance with Sections 9.9.2.A.3 and 9.9.2.A.4 within 14 days and in accordance with approved administrative procedures.

B. Plant Operations Review Committee (PORC)

Each plant shall have a PORC which shall function to advise the Plant Manager in matters related to nuclear safety. This advisory function shall be performed by the PORC acting in a formal meeting periodically and as situations demand. PORC shall be organized and shall conduct business as described below. The Chairman and members shall be appointed in writing by the Plant Manager. PORC members shall meet the experience

requirements of ANSI N18.1-1971 and ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, April 1987, "Qualification and Training of Personnel for Nuclear Power Plants," as outlined in Appendix B of this plan. This applies to the correlated ANSI N18.1-1971 and ANSI/ANS 3.1-1981 Manager or Supervisor position for the represented organization. (Operations representatives who hold or who have held SRO licenses at the station are considered qualified.)

1. Composition

The composition of PORC shall be as follows:

Chairman: Operations Manager  
Member: Operations representative(s)  
Member: Maintenance and Modifications representative(s)  
Member: Radiological and Chemistry Control (RADCHEM) representative(s)  
Member: Engineering representative(s)

2. Alternates

Alternate chairmen and members shall be appointed in writing by the Plant Manager.

3. Meeting Frequency

The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or designated alternate.

4. Quorum

The PORC shall consist of the Chairman or designated alternate and three of the four functional area representatives.

5. Reporting

The PORC reports to the Plant Manager on its activities and findings. The meeting minutes shall serve as the official correspondence from PORC to the Plant Manager. PORC recommendations shall be recorded in the minutes and submitted to the Plant Manager.

6. Functions

- a. Advise the Plant Manager on matters related to nuclear safety;
- b. Recommend to the Plant Manager approval or disapproval of items considered under Section 9.9.2.B.7; and
- c. Provide written notification to the Site Vice President and the NSRB of safety-significant disagreements between the PORC and the Plant Manager within 24 hours. The Plant Manager shall have responsibility for resolution of such disagreements.

## 7. Responsibilities

The PORC shall be used to conduct, as a minimum, reviews of the following. The PORC may delegate the performance of reviews, but shall maintain cognizance over and responsibility for them, e.g., subcommittees.

- a. The applicable administrative procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978
- b. The emergency operating procedures which implement NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33
- c. Physical Security Plan
- d. Radiological Emergency Plan
- e. Offsite Dose Calculation Manual
- f. Process Control Program (radwaste packaging and shipping)
- g. Additional PORC reviews specifically required by site-specific technical specifications or the plant's licensing basis
- h. Proposed changes to TS; Technical Requirements Manual; their bases; amendments to the Operating License; and
- i. Selected safety evaluations prepared in accordance with 10CFR50.59.

### 9.9.3 Records

The PORC shall maintain written minutes of PORC meetings that, at a minimum, document the results of its activities. Copies shall be provided to the Site Vice President. At a minimum, the PORC minutes shall include results of the activities conducted under the provisions of Section 9.9.