



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1499

May 25, 1999

Gary H. Claxton, Special Agent  
Office of Investigations  
U.S. Nuclear Regulatory Commission  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, Georgia 30303

Dear Special Agent Claxton:

During your recent visit to TVA's Central Laboratories and Field Testing Services (CL&FTS), formerly Central Laboratories Services (CLS), you asked to examine those portions of the CLS's Quality Assurance Program (QAP) dealing with the revision and/or deletion of CLS reports at the time the two metallurgical reports in question were written. I am enclosing the applicable portions of those Quality Assurance/Records program requirements at the time the reports were written, along with the following brief explanations.

Enclosure 1 is the Table of Contents of the CLS Department Quality Program.

Enclosure 2 is a portion of CLS-QAP 4.6 which describes the Central Laboratories' QA Program requirements for the various CLS departments, including metallurgy. Section 6.6.3 links the report generating process to the QA Records procedure.

Enclosure 3 is a portion of the QA Records procedure, CLS-QAP 12.3, which applies to completed QA records. Section 6.2 addresses the correction of records, but is largely limited to the line-through, initial, and date approach to record correction. Section 6.4.1, however, addresses storage of records in TVA's Records Information Management System (RIMS) in accordance with Section 2.0 of the RIMS Manual.

Enclosure 4 is a portion of Section 2.0 of the RIMS Manual, including those sections which address endorsements to reports and deletion of reports. Section 6.2.13 provides that important revisions may be made by endorsements. Alternatively, Section 6.3.2 also allows the organization which originates the record to request a deletion of that record. As you know, it was Delsa Frazier's intent to call back the first version of the report before it was ever placed in RIMS.

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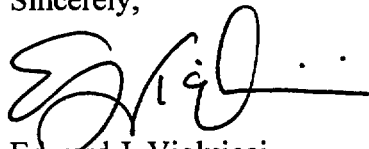
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For your information, I have also included in Enclosure 5 copies of two memoranda dated May 15, 1996, and June 18, 1997, sent by the Central Laboratories QA/QC Manager to the Central Laboratories staff, stressing the importance of using the Endorsement process in making additions, changes, or deletions to technical reports.

During the same visit to TVA's CL&FTS, you also requested that we look into whether there may be any electronic backup copies of any of the revisions to the subject metallurgical reports. I asked Richard L. Morley, Manager, CL&FTS, who is responsible for the overall management of the CL&FTS organization, to examine whether any such backup versions may still be retrievable. Upon completing his examination, Mr. Morley informed me that no such versions could be retrieved. According to Mr. Morley, CLS converted from the WANG word processing system to the Word Perfect system in approximately September 1992, and then CLS converted from Word Perfect to Microsoft Office's Word processing system in approximately September 1996. As you know, the subject reports were generated in June 1995. According to Mr. Morley, CLS did not convert and/or bring forward the data from the Word Perfect to the Microsoft Word system except in very limited cases involving documents of continuing programmatic value, such as the CLS QA Program Manual. Insofar as technical reports (including the subject metallurgical reports) were concerned, the rationale was that such reports were being maintained in TVA's RIMS data base, and there was no need to electronically convert or carry forward these individual reports, or any versions thereof, into the new Microsoft Word processing system. We have re-verified, however, that both versions of the subject metallurgical report still exist in the RIMS (now EDMS) data management system.

I hope this information is responsive to your inquiries. If you have any questions or need further information, please feel free to call me at (423) 632-7317.

Sincerely,



Edward J. Vigluicci  
Senior Attorney

Enclosures