



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

January 16, 2004

10 CFR 50.55(f)(3)

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

Gentlemen:

In the Matter of	)	Docket Nos.	50-391
Tennessee Valley Authority	)		50-438
			50-439

TVA NUCLEAR QUALITY ASSURANCE (NQA) PLAN (TVA-NQA-PLN89-A) - NRC  
REQUEST FOR ADDITIONAL INFORMATION (RAI) DATED OCTOBER 14, 2003  
(TAC NOS. MC0678, MC0683, AND MC0684)

The purpose of this letter is to respond to NRC's RAI regarding  
TVA's proposed changes to the NQA Plan submitted on August 28,  
2003.

The enclosure restates NRC's questions and provides TVA's  
responses.

There are no regulatory commitments in this submittal. If you  
have questions, please contact R. M. Brown at (423) 751-7228.

Sincerely,

*Mark J. Burzynski*  
Mark J. Burzynski  
Manager  
Nuclear Licensing

Enclosure  
cc: See page 2

Q004

U.S. Nuclear Regulatory Commission  
Page 2  
January 16, 2004

cc (Enclosure):

Mr. Stephen J. Cahill, Chief  
U.S. Nuclear Regulatory Commission  
Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, Georgia 30303-8931

Ms. Margaret H. Chernoff, Project Manager  
U.S. Nuclear Regulatory Commission  
MS 08G9  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852-2739

NRC Senior Resident Inspector  
Watts Bar Nuclear Plant  
1260 Nuclear Plant Road  
Spring City, Tennessee 37381

ENCLOSURE

TENNESSEE VALLEY AUTHORITY (TVA)  
RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION

Request for Information

TVA proposes the addition of a new Appendix F to the NQAP which states that deferred plant equipment may be abandoned in place.

The U.S. Nuclear Regulatory Commission's policy statement on deferred plants was published in the Federal Register (52 FR 38077) on October 14, 1987. Holders of construction permits for nuclear power plants were alerted of the policy through Generic Letter 87-015, which calls particular attention to quality assurance requirements for maintenance, preservation and documentation.

Please describe how your position on deferred plant equipment, described in the proposed new Appendix F to the NQAP, is consistent with the Commission's policy.

Response

TVA's proposed NQA Plan change will allow TVA some flexibility to discontinue maintenance, preservation, and documentation (MPD) activities for certain structures, systems, and components (SSC) where such maintenance is no longer practical or feasible. For those SSC which TVA continues to conduct MPD activities, the MPD requirements will be maintained under the terms of the current NQA Plan.

This approach is entirely consistent with the requirements of Generic Letter 87-15. Implicit in the Commission's Policy Statement on Deferred Plants is the notion that those SSC being protected under the policy actually be in place and relied upon at the time the plant is eventually reactivated and put into operation. This is, in fact, more than an implicit understanding. In response to a commenter on the policy statement regarding SSC which are safety-related vs. important to safety, the NRC stated, "In the context of this policy statement, it is expected that a utility, planning to maintain its reactivation option or transfer of ownership to others, will identify any structures, systems, and components (SSC) which are important to safety and establish appropriate maintenance, preservation, and documentation (MPD) for these SSC. *If a utility determines, based on an analyses of cost effectiveness, to develop MPD only for safety-related SSC, it must recognize a possibility that SSC for which appropriate MPD were not developed may have to be replaced if and when reactivation or transfer of ownership takes place.*" (52 Fed. Reg. 38077 [October 14, 1987]) In TVA's case, we have made certain determinations, and may make future determinations, that it would be

more economical to replace or possibly restore certain SSC following testing by repair or corrective maintenance than to continue pointless MPD activities. NRC's policy should not be interpreted in a manner that would require utilities to develop and maintain MPD for SSC which may be removed, never be used, and must be replaced anyway. Though TVA's ratepayers understand and bear the increased costs associated with high-level QA requirements because of the important degree of assurance they provide, it would be very difficult to defend the expenditure of these high costs to maintain SSC which TVA determines will never be used or may be able to be eventually refurbished, tested, and fully qualified for later use at a much lower cost. QA requirements for MPD are and will continue to be maintained for "active" SSC and the lay-up and NQA Plan requirements will not change.

### Request for Information

Further, describe your process for tracking and documenting the status of deferred plant equipment pending reactivation of construction activities.

### Response

Under the proposed lay-up program, TVA would have the ability to characterize SSC as either active or inactive. SSC would be identified, recorded, and its status tracked by the following methods:

#### Watts Bar Unit 2

Active/Inactive items would be shown in a data field in a QA verified database.

#### Bellefonte Units 1 and 2

Active/Inactive items would be shown in a data field on a QA record that is generated to document preventative maintenance. These records would be verified by a controlled process consistent with data use requirements of NQA Plan, Section 13.0, and Appendix E. Based on these requirements, the related software is not required to be quality-related because the data is further verified by a controlled QA records process before issuance of records.

In both situations, QA data would be readily available to indicate equipment status for eventual construction.

For those SSC classified as active, the QA requirements for MPD would continue to be maintained. MPD activities would cease for SSC classified as inactive. Upon resumption of construction activities or should the particular SSC be considered for reinstallation in an operating unit, TVA may consider the viability of restoring the SSC by evaluating and/or testing it as required in order to prove that it has not become degraded and that it can perform its intended function. Any inactive SSC which cannot be adequately restored to adequately perform its intended function would be replaced or removed by the design change process.