

DMB

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

85 NOV 20 P 1:1d

November 15, 1985

U.S. Nuclear Regulatory Commission  
Region II  
Attention: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNIT 1 - NRC INSPECTION REPORT NO 50-390-85-38 -  
VIOLATION 50-390-85-38-01 (CIVIL PENALTY ACTION EA 85-64) - SUPPLEMENTAL  
RESPONSE

This response is in regard to your letter to H. G. Parris dated October 21,  
1985. Enclosed is our supplemental response. This information is intended to  
describe in greater depth activities currently underway to satisfy commitments  
made in paragraphs 4.A and 4B of our September 27, 1985 submittal. As such,  
these descriptions do not modify or add to the previous commitments.

If there are any questions, please get in touch with R. H. Shell at FTS  
858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. W. Hufham*  
J. W. Hufham, Manager  
Licensing and Risk Protection

Enclosure

cc (Enclosure:)

Mr. James Taylor, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Records Center  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
Atlanta, Georgia 30339

8512020352 851115  
PDR ADOCK 05000370  
G PDR

IEO!

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO NRC LETTER FROM J. NELSON GRACE TO H. G. PARRIS  
DATED OCTOBER 21, 1985

Reference: Report No. 50-390/85-38 - Violation 50-390/85-38-01

SUPPLEMENTAL INFORMATION FOR PARAGRAPH 4.A.

In September 1985 an informal review was performed of SER Appendix D commitments, as described in the February 18, 1985 letter to NRC. The purpose of this review was to identify any commitments which were not clearly complete. The results of this review were preliminary at the time of our response to 50-390/85-38-01. However, it was apparent that not all commitments from the February 28, 1985 letter were complete. Hence, the paragraph 4.A commitment to enter any incomplete commitments in the Corporate Commitment Tracking System (CCTS). The following describes those preliminary findings and their further evaluation and disposition.

1. Finding:

One set of control room headsets had been identified as missing around August 1985. The headset and its associated jack had been identified as installed in Section 1.3 of our February 28, 1985 letter.

Disposition:

The headset was replaced under Maintenance Request (MR) A-583009 in September 1985. Follow-up in October 1985 confirmed the headset to be in place. Therefore, no further actions are to be taken with respect to this finding.

2. Finding

Section 1.4 of the February 28, 1985 letter commits to the performance of a noise level assessment and reporting of data to NRC 120 days after fuel loading. Section 3.1 commits to making all annunciator alarms operational by fuel load.

Disposition:

These commitments have been entered in the commitment tracking system (NCO-84-0165-001).

WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO NRC LETTER FROM J. NELSON GRACE TO H. G. PARRIS  
DATED OCTOBER 21, 1985

3. Finding

Sections 2.1 -2.7 of the February 28, 1985 letter commits to the review of the final control room lighting survey data during the CRDR process.

Disposition:

This commitment has been entered in the commitment tracking system (NCO-84-0165-003 and NCO-84-0165-007).

4. Finding

Some instrument bus personnel protective shields were identified as being insecure in late 1984. These were identified as installed in Section 3.7 of our February 28, 1985 letter.

Disposition:

Further evaluation revealed that while all the shields had been originally installed, some had fallen off and been replaced. While the commitment was originally satisfied, we will evaluate the effectiveness of these shields to determine the need for design improvements. This work is covered under the scheduled detailed Control Room Design Review (CRDR).

5. Finding

There were three SER Appendix D items for which the CRDR team records did not clearly reflect field inspection by the CRDR team as the basis for closure.

Disposition:

Subsequent evaluation has confirmed that proper inspection was the basis for closure. Therefore, no further action is warranted.

SUPPLEMENTAL INFORMATION FOR 4.B

In a recent policy memorandum the Manager, P&E (Nuclear), designated the Corporate Commitment Tracking System (CCTS), a computerized data base administered by the Nuclear Licensing Staff (NLS), as the integrated data base for tracking all formal commitments made to NRC.

WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO NRC LETTER FROM J. NELSON GRACE TO H. G. PARRIS  
DATED OCTOBER 21, 1985

The policy defined a commitment as "a written and docketed statement of TVA actions taken or to be taken by some future date (milestone or calendar date)." In order to maintain management control over commitments and ensure that all commitments are documented and tracked, the policy requires all commitments to be documented in formal correspondence and/or LERs to NRC. Once the commitment is formally transmitted, NLS will make the initial entry on the CCTS and assign the commitment control number.

The responsible organization (i.e., WBN) will maintain the status of the commitment on the CCTS until its completion. After completion, NLS will close the item upon receipt of adequate documentation providing appropriate concurrence for closure. NLS will periodically issue reports showing numbers of commitments made, completed, and closed by each organization.

The process for implementing the CCTS at WBN is underway. This effort is to ensure that all commitments open on or after November 1, 1985 are incorporated into the CCTS. The various tracking systems (plant, engineering, construction, and licensing) are being utilized to define the complete set of open/incomplete commitments. These commitments have been identified and placed into the CCTS.

Full implementation will be achieved when the actions (i.e., updating the CCTS data base for WBN and implementing procedures for proper use) are complete and procedures are in place. The schedule for completing these actions for Watts Bar unit 1 continues to be December 1, 1985.

NLS will continue to administer the CCTS. It will be NLS's responsibility to assist in identifying commitments when they are transmitted to NRC and to ensure that they have appropriate management review and approval. NLS will make the initial entry into the CCTS and assign the tracking number. Commitments having multiple independent parts or applicability to multiple units will be entered as separate commitment items; however, commitments which require multiple tasks or actions to complete will be entered as one item and remain open/incomplete until all actions are complete. The implementing organization (WBN) will maintain and provide status updates on the CCTS. NLS will be responsible for closing the item after it is completed and adequate provisions (such as NRC closure) are provided to justify closure. H. G. Parris will require a performance objective of each implementing organization (WBN) regarding meeting commitment dates.

WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO NRC LETTER FROM J. NELSON GRACE TO H. G. PARRIS  
DATED OCTOBER 21, 1985

A method of independent verification of closure of TVA commitment actions is being formulated. We envision this verification process to entail utilizing TVA's Quality Assurance organization to independently verify (as a review by an independent person) that the work performed meets the intent of the original (or revised) NRC commitment. The Manager, Nuclear Licensing, will ensure that the independent verification system is established.

Copies of the policy statement and guidance are attached. Note that actions identified for the Nuclear Licensing Branch (NLB) are now the responsibility of the Nuclear Licensing Staff (NLS).

Improvements in the management of WBN unit 1 commitments has progressed as follows:

- . The site director was designated the unit 1 owner operator on September 16, 1985. Since that date, all but one licensing submittal to NRC has been specifically approved by the site director.
- . Since September 16, 1985 numerous licensing submittals have required extended schedules for submission. The site director has taken this action in order to upgrade the quality of proposed commitments prior to allowing them to be docketed. Underlying causes for the inadequate proposals are being identified and evaluated. It is apparent that a quick fix to achieve quality responses within the desired timeliness is not achievable. However, it is believed that the best cause is to insist on quality with each submittal even if the schedule must slip. Therefore, we will continue on that course while attempting to improve our problem solving and licensing document skills.
- . Lead coordinators maintain an owner/operator perspective. All the actions of all organizations which need to be completed in a coordinated manner are followed. Once these actions are complete and the intent of the commitment satisfied, the lead coordinator initiates the change of commitment status to "COMPLETED."
- . At the implementation level, in the short term there is continued use of other tracking systems (TROI, CATS). Lead coordinators must ensure that status codes and terminology characteristic to these systems is understood so that miscommunication is avoided.
- . Data base verification by lead coordinators and status updating is in progress.
- . Use of CCTS printouts in work control meetings is planned to start the week of November 25, 1985.

ATTACHMENT 1

The following is taken from a memorandum from H. G. Parris to Those listed dated September 26, 1985:

The purpose of this memorandum is to issue the Power and Engineering (Nuclear) (P&E (Nuclear)) policy to control the making of commitments to NRC, tracking commitments through implementation, and maintaining compliance with commitments throughout plant life.

For the purpose of this policy, a commitment is defined to be a written and docketed statement of TVA actions taken or to be taken by some future date (milestone or calendar date).

Only an owner/operator or the manager of the owner/operator can make or modify a commitment. Verbal commitments should not be made. If during meetings, conference calls, etc., with NRC a commitment statement is made by TVA personnel, it does not become a formal commitment until it is approved and submitted to NRC in writing. Before commitments are made to NRC, the owner/operator shall ensure that the proposed commitment is necessary, accurately defined, evaluated for achievability and effect on existing activities, and sufficient to satisfy regulatory requirements or P&E (Nuclear) policy.

The Nuclear Licensing Branch (NLB) is responsible for formal submittals to NRC. Exceptions to this are Licensee Event Reports (LERs) which are formally transmitted by the owner/operator to the NRC regional office.

The Corporate Commitment Tracking System (CCTS), a computerized data base, will be used to track all NRC commitments. This tracking system will be the only one referenced in discussion with or formal correspondence to NRC regarding commitment tracking.

The owner/operator is responsible for timely completion/implementation of commitments and ensuring that commitments continue to be satisfied, as appropriate, throughout plant life.

The NLB will administer the CCTS for the Manger of P&E (Nuclear) and will develop a program guidance document to implement this policy. Affected organizations within P&E (Nuclear) shall provide to the NLB single point of contact for coordinating the implementation of these activities by October 7, 1985.

I expect each of you to utilize resources necessary to implement this policy.

ATTACHMENT 2

The following is taken from a memorandum from W. T. Cottle to Those listed dated October 2, 1985:

In accordance with the memorandum from H. G. Parris to Those listed dated September 26, 1985 (L44 850919 805), attached is the program guidance to implement the policy regarding control over making commitments to NRC, tracking commitments through implementation, and maintaining commitments throughout plant life.

This guidance is effective immediately.

## ATTACHMENT

### POWER AND ENGINEERING (NUCLEAR) (P&E (NUCLEAR)) PROGRAM GUIDANCE FOR CONTROLLING THE MAKING OF COMMITMENTS TO NRC, TRACKING COMMITMENTS THROUGH IMPLEMENTATION, AND MAINTAINING COMPLIANCE WITH COMMITMENTS FOR THE LIFE OF THE PLANT

**Purpose:** The purpose of this program guidance is to ensure that commitments to NRC are evaluated, approved, documented, tracked, implemented, and maintained to ensure regulatory compliance. This document provides the guidance and requirements to implement the Manager of P&E (Nuclear) policy regarding controlling the making of commitments to NRC, tracking commitments through implementation, and maintaining compliance with commitments throughout plant life. The program applies (as a minimum) to incomplete commitments and subsequent commitments made to NRC.

#### Responsibilities

- A The owner/operator of each TVA nuclear facility is responsible for:
1. Making and/or modifying commitments to NRC relating to his plant.
  2. Evaluating proposed commitments to ensure that they are necessary, accurately defined, achievable, and sufficient to satisfy regulatory requirements.
  3. Tracking, implementing, and maintaining continued compliance of NRC commitments.
  4. Appropriate coordination of commitment actions with other TVA organizations.
- B. Nuclear Licensing Branch (NLB) is responsible for:
1. Management of the Corporate Commitment Tracking System (CCTS) data base, including initial entry of commitments into CCTS and assignment of commitment number.
  2. Formal submittal of all commitments to NRC except for LERs which are transmitted directly from the owner/operator to the NRC regional office.
  3. Overseeing implementation of this program for the Manager of P&E (Nuclear).

Definition of Commitment--Written and docketed statement of TVA actions taken or to be taken by some future date (milestone or calendar date).

POWER AND ENGINEERING (NUCLEAR) (P&E (NUCLEAR)) PROGRAM  
GUIDANCE FOR CONTROLLING THE MAKING OF COMMITMENTS TO NRC,  
TRACKING COMMITMENTS THROUGH IMPLEMENTATION, AND MAINTAINING  
COMPLIANCE WITH COMMITMENTS FOR THE LIFE OF THE PLANT

COMMITMENT CONTROL

Commitment control is necessary to avoid making conflicting and/or unneeded commitments. If proper coordination and evaluation precede the making of commitments, recognition of the total range of implications associated with a particular proposed commitment could result in improved safety and operating performance at the plant sites. For instance, commitments to modify plant systems or operating procedures to accomplish specific purposes may be fully justifiable. However, the side effects of certain changes could cause more overall harm than good. Commitment control will ensure sound decisionmaking before commitments are made.

A commitment evaluation should be made by the responsible organization in the context of Power and Engineering Administrative Instruction II PROJECT MANAGEMENT. The evaluation will provide pertinent information regarding overall impact (cost, training, maintenance, and other resource requirements) associated with implementation of the commitment. Once appropriately documented and evaluated, NRC commitments shall be authorized by approval of the owner/operator.

The NLB will review proposed commitments, except those contained in LERs, before they formally transmit them to NRC to ensure regulatory compliance, adherence to P&E (Nuclear) policy, and appropriate coordination with other organizations.

CORPORATE COMMITMENT TRACKING SYSTEM (CCTS)

This program tracks commitments made to NRC in formal correspondence. If formal commitments are made to NRC in a meeting, telecon, etc., they must be documented in a letter to NRC. Each commitment shall be clearly documented on a commitment verification and completion form, similar to the form on page 6 of this addendum. The form must accompany the commitment being transmitted to NLB for formal submittal to NRC. If a commitment is made in an LER which is formally transmitted directly from the owner/operator to the NRC regional office, a copy of the transmittal along with a commitment verification and completion form will be sent to NLB. (This requirement does not apply to informal or incidental agreements made in the course of day-to-day dealing with resident or regional inspectors.)

POWER AND ENGINEERING (NUCLEAR) (P&E (NUCLEAR)) PROGRAM  
GUIDANCE FOR CONTROLLING THE MAKING OF COMMITMENTS TO NRC,  
TRACKING COMMITMENTS THROUGH IMPLEMENTATION, AND MAINTAINING  
COMPLIANCE WITH COMMITMENTS FOR THE LIFE OF THE PLANT

NLB is responsible for the proper coordination within TVA of correspondence which it transmits to NRC. NLB will ensure that commitments to NRC are properly identified and the organization designed as responsible for implementation agrees with the commitment before it is officially released to NRC. Once the correspondence transmitting the commitment has been released to NRC, NLB will input the initial data for each commitment into the CCTS and assign the commitment number.

The owner/operator of each nuclear facility will designate a person/functional group (hereafter called "designated contact") to be responsible for coordinating with NLB and maintaining the CCTS. The owner/operator will be responsible for implementing procedures and performing the following functions: (1) making periodic updates and identifying the new items that have been added to the system for which they are responsible, and (2) reviewing the commitment(s) and ensure appropriate assignment(s) have been made in the CCTS to the organization(s) responsible for implementing the commitment. If the owner/operator finds an error in the assignment or actions, NLB will be immediately notified. NLB will coordinate with the designated contact the reassignment of the commitment or modification of the commitment action. Where conflict exists that cannot be resolved with the designated contact, appropriate management will be contacted to resolve the issue.

The owner/operator is responsible for maintaining appropriate program records associated with commitments. Program records should contain the following types of information:

- a. Documented acceptance of responsibility for implementation of the commitment by section/group within his organization.
- b. Copy of document which initiated the commitment.
- c. Any documentation necessary to report status and completion of commitment.

The owner/operator should generate periodic status reports to be sent to the implementing organizations advising them of all their open items. The owner/operator will be responsible for maintaining the current status of commitments on the CCTS. If an implementing organization cannot meet a commitment date, appropriate management (i.e., owner/operator) must be notified and a determination of action to be taken made. NLB must be notified immediately of changes to commitments or upon discovery that a

POWER AND ENGINEERING (NUCLEAR) (P&E (NUCLEAR)) PROGRAM  
GUIDANCE FOR CONTROLLING THE MAKING OF COMMITMENTS TO NRC,  
TRACKING COMMITMENTS THROUGH IMPLEMENTATION, AND MAINTAINING  
COMPLIANCE WITH COMMITMENTS FOR THE LIFE OF THE PLANT

commitment cannot or will not be met on time. The action to be taken and new completion date will be documented in a letter from NLB to NRC.

When the responsible organization completes the action to meet the commitment, the Commitment Verification and Completion Form must be filled out and signed by the responsible manager describing the action taken to complete the commitment. The owner/operator inputs information (action taken to complete commitment, completion date, person who signed form, and RIMS number of completion form) into CCTS. A copy of the commitment verification and completion form should be kept for the plant files and the original sent to RIMS. NLB will periodically issue reports showing numbers of commitments made, completed, and closed by each organization.

When completed or implemented, a commitment will remain in the "completed" status on the CCTS until documented closure of the item is complete. After NRC and/or TVA close the item, NLB will change the "completed" status to "closed" and reference the closure document in the remarks section of the CCTS.

#### Maintaining Commitments

Each owner/operator is responsible for ensuring that continued compliance with commitments is maintained. The programmatic controls for commitment compliance will be developed/maintained at the discretion of the owner/operator.

Requests for changes/improvements to these guidelines will be submitted to NLB. NLB will evaluate the proposed changes and coordinate with all affected organizations before issuance of changes that affect the intent or responsibilities as stated in these guidelines.

COMMITMENT VERIFICATION AND COMPLETION FORM

PART I.

COMMITMENT NUMBER \_\_\_\_\_

COMMITMENT MADE TO: \_\_\_\_\_ (Organization)

COMMITMENT DUE DATE: \_\_\_\_\_

RESPONSIBLE ORGANIZATION: \_\_\_\_\_

COMMITMENT DESCRIPTION: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

-----  
PART II.

COMMITMENT COMPLETION DATE: \_\_\_\_\_

ACTION TAKEN: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

PART III.

VERIFICATION

\_\_\_\_\_  
Supervisor

\_\_\_\_\_  
Date

\_\_\_\_\_  
CCTS Updated

\_\_\_\_\_  
Date