UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OFFICE OF NUCLEAR REACTOR REGULATION

TVA PROJECTS DIVISION

Report Nos.: 50-390/89-17 and 50-391/89-17

Licensee: Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Docket Nos.: 50-390 and 50-391

Construction Permit Nos.: CPPR-91 and CPPR-92

Facility Name: Watts Bar Units 1 and 2

Inspection Conducted: September 26, 1989 through September 29, 1989

Inspectors: Tom Daniels
Tom Daniels, Team Leader — 10/18/89 Date

Raj G. Anand
Raj Anand, Reactor Systems Engineer — 10/18/89 Date

R. Raymond Wharton
Ray Wharton, Quality Operations Engineer — 10/18/89 Date

Approved by: Tom Daniels for
John W. Craig, Special Assistant
Associate Director for Special Projects
Office of Nuclear Reactor Regulation — 10/18/89 Date

SUMMARY

Scope:

This special announced inspection was conducted in the area of allegation followup to establish validity and to verify corrective actions that have been implemented for those determined to be valid.

The basis for this inspection was various allegations received by the NRC.

Results:

No violations, deviations, unresolved items or inspection followup items were identified.

Several allegation evaluations were completed as discussed in the report.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*D. Douthit, Program Manager
*G. Brantley, ECP/WBN
*T. Pitts, Project Manager
*L. Ellis, ECSP
D. Baker, ECP
*W. Whittle, ECSP
S. Franks, ECP

and other personnel of the plant staff.

NRC Employees

G. Walton, Senior Resident Inspector
*T. Daniels, Project Manager
*R. Anand, Reactor Systems Engineer
*R. Wharton, Quality Operations Engineer

2. Allegations

a. OSP-85-A-15

(1) An allegation was received by the NRC staff which stated:

Inadequate voltage regulation for electrical buses. TVA operates buses above normal voltage rating, experiences voltage drops, reliability degraded and diesels cycled.

(2) The concerns regarding improper electrical bus operation and regulation at Sequoyah (SQN) and Browns Ferry (BFN), and potential equipment damage as a result of station overvoltage at SQN were evaluated for generic applicability to Watts Bar (WBN). The concern was substantiated, and safety-related issues were identified and corrected. The concern is addressed in the Employee Concerns Special Program (ECSP) subcategory Report 30200 "Electrical and Communications". The issue concerns the adequacy of offsite power systems supplying the onsite Class 1E distribution system. The design adequacy of the offsite power was reviewed by the NRC staff including the TVA's grid stability analysis and evaluation is documented in the Safety Evaluation Report (SER) NUREG-0847 and SSERs. In regard to the capability of the offsite power system, the staff concluded in the SER, that the offsite power system was acceptable. In addition, the staff has verified the analysis of low and/or degraded grid voltage conditions and found the results to be satisfactory. A review of voltage data revealed that 480-volt shutdown board voltages infrequently have been in excess of the safe operating voltage

*Attended exit interview

limits prescribed by ANSI C84.1-1970, "American National Standard Voltage Ratings for Electrical Power Systems and Equipment (60H$_z$)," and by Supplement ANSI C84.1a-1973. These excessive voltages have occurred for two reasons. The first is that various safety-related transformer taps at WBN are set to step up bus voltage by as much as five percent. Therefore, when the 161-kV and 500-kV grids which supply the shutdown boards have been operated above nominal voltage values, excessive voltages on the 480-volt shutdown boards have resulted. The second is that the surveillance procedures did not list any upper limit acceptance criteria for voltage levels on the shutdown boards. Because of this, no action has been taken to reduce 480-volt shutdown board voltage. The licensee did revise applicable procedures to account for this lack of acceptance criteria. Should the grid voltage exceed the upper limits, actions will be taken to either lower grid voltage or change tap settings to adjust plant voltage. Inspection report number 50-327/89-14 and 50-328/89-14 conducted in April 1989 at Sequoyah found that inadequate procedures lead to excessive voltages on the shutdown board. A notice of violation was issued August 31, 1989. TVA responded on September 29, 1989 and corrective actions include revisions to the appropriate procedures, guidance to operations personnel to reduce overload conditions, and notifying of the lead electrical engineer when overvoltage conditions occur. TVA staff has indicated that there is no history of diesel generator cycling as alleged. According to TVA staff, the diesel generators (D/G) are tested periodically and perhaps this is being misconstrued as D/G cycling. Based on the above, this allegation is considered resolved.

b. OSP 85-A-0028 and OSP 85-A-0058

(1) Two allegations were received by the NRC staff which stated:

Quality Assurance (QA) has not effectively audited the design and construction process. Quality has been "inspected into" the plant, not designed and constructed into the plant.

(2) This allegation was substantiated. TVA has recognized a number of quality problems and weaknesses in the implementation of its nuclear quality assurance program. Therefore the concerns related to ineffective audits are considered valid. TVA has identified auditing problems in the design and construction activities at Watts Bar which are discussed in the Watts Bar Nuclear Performance Plan, Volume IV, Revision 1, May 1989. To correct these problems TVA had restructured the Division of Nuclear Engineering and established an Engineer Assurance organization. This organization was responsible for assessing engineering work for technical adequacy and effectiveness, evaluating trends of engineering quality problems, and reviewing corrective and preventive action for generic problems. The responsibilities of the Engineering Assurance organization have since been transferred to the Quality Assurance organization. A full-time, technically oriented auditing staff has been established to conduct nuclear program audits and QA program assessments. The staff consists of engineering or technical degreed auditors trained and qualified to conduct process oriented and programmatic audits and evaluations. Audit teams

include, as appropriate, health physicists; construction and operations specialists; reactor operators; and engineering disciplines, such as mechanical, electrical, chemical, civil, nuclear and engineering physics. TVA has improved their audits of design and construction activities by centralizing the audit responsibilities solely within the Quality Assurance organization. The reorganization has established a full-time audit staff trained and qualified in engineering and technical disciplines. The NRC staff has reviewed and approved the reorganization reported by TVA. Other corrective actions to improve the auditing process have been incorporated in the revised TVA QA Topical Report. This area will be further reviewed by the NRC staff during the implementation inspections conducted to verify proper completion of TVA's Corrective Action Program number 2.3, Design Baseline and Verification Program. The inspector determined that the concerns expressed in these allegations have been adequately addressed and are considered resolved.

c. OSP 85-A-0039

(1) An allegation was received by the NRC staff which stated:

Nonconformance Reports (NCRs) are being closed on a promise of action vice completion of corrective action. Corrective Action Requests are being suppressed.

(2) This allegation was substantiated. The areas of nonconformance control and corrective action at Watts Bar (WBN) was reviewed during the Employee Concern Special Project investigations. In Subcategory Report 80400 the major findings indicated several conditions which degraded the nonconformance control and corrective action programs. It was found that discrepancies were not promptly identified, reporting systems were overly complicated and confusing, licensing commitment tracking was inadequate, and sampling of identified noncompliances as a basis for acceptance of noncompliance resolution was inadequate.

Since no specific examples of improper closure or suppression of corrective action requests were given by the alleger, a review was conducted of audits performed by the WBN audit group to determine if the problems as noted above still existed in the Conditions Adverse to Quality (CAQ) program.

The review indicated that WBN has made significant improvements in their corrective action programs. This was evident by the programmatic upgrades including: major revision of procedures for handling safety significant issues, conducting a formal comprehensive training program for using the revised procedures, the implementation of a tracking system which is capable of assuring timeliness in addressing identified issues, and the establishment of a site coordinator who is responsible for the administrative handling of the CAQ documents.

In addition to the programmatic prccedure requirements the level of management review for CAQ documents has been upgraded. This is accomplished by having a Management Review Committee review issues to determine the disposition of all CAQ reports. Further, it was

noted that increased attention by Senior Management of TVA toward the improvement of the CAQ programs and their efficient implementation has led to increased TVA staff awareness of the requirements of the CAQ program.

While the review indicated that there were still some implementation deficiencies in the CAQ process that need correction, TVA's overall program and more specifically WBN's program for handling of corrective actions appears to have improved sufficiently to close the allegation. The processing of CAQ reports will be further evaluated and reviewed by the NRC staff during the implementation inspections conducted to verify proper completion of TVA's Corrective Action Program. This allegation is considered resolved.

d. OSP 85-A-047

(1) An allegation was received by the NRC staff which stated:

General construction specifications are inadequate and incomplete.

(2) This allegation was substantiated. It is alleged that construction, test and installation specifications, those identified by a "G" letter prefix, are often incomplete and inadequate.

This issue, programmatic in nature, has been explicitly addressed in employee concerns subcategory 20400 "Organization and Operating Procedures". The NRC consultant, Parameter, Inc., reviewed the subject allegation and prepared a Technical Evaluation Report (TER). The staff reviewed the TER and concurred in the bases and findings for Sequoyah and considers that the same findings were applicable to all the other design organizations of the TVA. TVA has implemented the specification improvement program and as part of this effort, G-Specifications, as applicable, are replaced with Engineering Requirements Specifications. In addition, the Commitments/Requirements Database and the Design Baseline and Verification Program are significant TVA actions taken to verify that installed items are correctly configured to design requirements. The staff concludes that TVA action on this issue is acceptable. This area will be further reviewed by the NRC staff during the implementation inspections conducted to verify proper completion of TVA's Corrective Action Program number 2.3, Design Baseline and Verification Program. This allegation is considered resolved.

e. OSP 85-A-0048

(1) An allegation was received by the NRC staff which stated:

The electrical test program and planning are inadequate.

(2) This allegation was substantiated. The issue of inadequate electrical testing and planning with respect to adequacy of testing and acceptance criteria had been previously recognized by TVA. This concern had been evaluated in Employee Concerns Special Program (ECSP) Subcategory Report 21300, "Electrical Testing and Planning", element 213.2. A review of Subcategory Report (21300, Element 213.2) indicated that

the issue had been previously identified by TVA and adequate corrective action was in place. Engineering participation in the overall pre-operational test program was found to be adequate based on the evaluation of test scoping documents and test results packages. In addition, the TVA evaluation team found no evidence that staffing was inadequate to provide reasonable test activity support. This area will be further reviewed by the NRC staff during the implementation inspections conducted to verify proper completion of TVA's Corrective Action Program number 2.3, Design Baseline and Verification Program. Based on the evaluation performed by TVA, this allegation is considered resolved.

f. OSP 85-A-0052

(1) An allegation was received by the NRC staff which stated:

TVA Office of Engineering is inadequate, with 12 specific citations of inadequacies concerning engineering functions.

(2) This allegation was substantiated. The issue is programmatic in nature and refers to organizational and/or procedural problems in the engineering design process. The NRC consultant, Parameter, Inc., reviewed the subject allegation and prepared a Technical Evaluation Report (TER). The staff reviewed the TER and concurred in the bases and findings for Sequoyah and considers that the same findings were applicable to all the other design organizations of the TVA. A review of TVA Corrective Action Tracking Documents (CATD) and Employee Concerns Subcategory Report 20400 "Engineering Organization and Operating Procedures", resolves the concerns and properly encompasses the issues addressed in the allegation. In addition, TVA has targeted improvements in engineering and design process as defined in Corporate Nuclear Performance Plan (NPP) and site specific performance plans. This area will be further reviewed by the NRC staff during the implementation inspections conducted to verify proper completion of TVA's Corrective Action Program number 2.3, Design Baseline and Verification Program. This allegation is considered resolved.

g. OSP 86-A-0016 and OSP 86-A-0040

(1) These allegations were received by the NRC staff which stated:

The major electrical calculations may not be adequate or records cannot be verified to include the proper inputs. Therefore, the electrical systems and components may not be functioning within their design limits set forth by the regulatory requirements, licensee commitments and license conditions.

(2) This allegation has been substantiated. The Employee Concerns Special Program (ECSP) has addressed these issues in Subcategory Report 24600 "Design Calculations," Element 205.1 and 243. In the past, problems and confusion developed with respect to TVA's nuclear engineering organization and on site engineering activities. The lack of a centralized engineering organization and duplication of engineering expertise and overlapping responsibilities contributed

to problems in areas such as design control and configuration control. TVA has developed a series of nuclear performance plans (NPPs) to correct programmatic and management deficiencies that have contributed to the continued poor direction and control of TVA's nuclear activities. Volume 1 of the NPP describes the measures that TVA has taken and currently intends to take to improve the corporate-level management of its nuclear activities and to correct the problems that have occurred in this area. Volumes 2, 3, and 4 address Sequoyah (SQN), Browns Ferry (BFN) and Watts Bar (WBN) respectively. The three site specific nuclear performance plans provide an account of the actions TVA is taking, or will take, to improve its nuclear program. These measures, when implemented, should resolve the identified problem areas and prevent their recurrence.

TVA has committed in the site specific NPPs (under "Special Programs") for SQN, BFN, WBN to a design calculation review program. The calculation reviews have the common objectives of identifying essential calculations, verifying the existence of safety-related calculations, ensuring the technical adequacy of safety-related calculations, and ensuring that essential calculations associated with problem areas and selected calculations for areas where problems have not been identified and the development of any missing calculations necessary to support plant design. Safety-related calculations are defined as calculations for safety. As calculations are reviewed for technical adequacy, significant deficiencies will be identified and tracked with a Condition Adverse to Quality Report. This process includes the identification of appropriate corrective actions. Similar to SQN, the staff is currently reviewing NPP with respect to the calculation efforts. The final acceptance of TVA's corrective actions will be documented in WBN NPP Volume 4 SER. This area will be further reviewed by the NRC staff during the implementation inspections conducted to verify proper completion of TVA's Corrective Action Program number 2.3, Design Baseline and Verification Program.

Based upon the NRC staff review of the TVA's employee concerns evaluation efforts, corrective actions and the other associated actions described in the Watts Bar NPP, these allegations are considered resolved.

h. OSP 86-A-0026

(1) An allegation was received by the NRC staff which stated:

TVA's QA organization at construction sites lacks the independence required by the NRC.

(2) This allegation was substantiated. Due to the number of quality problems and weaknesses in TVA practices at its nuclear facilities, the Quality Assurance allegations are considered valid.

TVA's construction QA organization at Watts Bar has been established to comply with commitments contained in TVA Topical Report, TVA-TR75-1A, Revision 8, "Quality Assurance Program Description for the Design, Construction, and Operation of TVA Nuclear Power

Plants," which was approved by NRC letter from Roger D. Walker to H. G. Parris dated April 9, 1985. TVA's nuclear QA and quality control (QC) functions had not been effectively unified under a single department. As a result, TVA's nuclear QA activities were not performed under a consistent set of programs and procedures, and TVA's nuclear QA groups did not report to a high level of management within TVA (thereby diminishing the visibility and importance of these activities to management). To improve this situation, TVA has reorganized the QA organization. In the new organization, QA and QC functions report to the Vice-President of Nuclear Quality Assurance (DNQA) who reports to the Senior Vice-President Nuclear Power. This revised QA organization provides a consolidation of responsibility for nuclear QA/QC functions, including QA/QC activities related to engineering, construction and operations, as well as QC inspections and QA audits of construction, maintenance, and modification activities.

Since these changes have been approved by the NRC, it has been determined that TVA is in compliance with the requirements of 10 CFR 50, Appendix B with regard to quality assurance organizational independence. This allegation is considered resolved.

i. OSP 86-A-0056

(1) An allegation was received by the NRC staff which stated:

Does Watts Bar meet today's requirements in fire protection? If not, should it and is a total review justified?

(2) This allegation was not substantiated. Watts Bar Nuclear Plant (WBN) is required to meet present fire protection requirements which are described in Branch Technical Position (BTP) CMEB 9.5-1 (July 1981). WBN first submitted its Fire Protection Analysis to the NRC in September 1980. The staff issued a Safety Evaluation Report (SER) in June 1982 and has issued four supplements to the SER since then. WBN is currently addressing open issues identified in the staff SER. In July 1984, the staff performed a fire protection inspection at WBN (Inspection Report Nos. 50-390/84-55 and 50-391/84-43) and identified eleven inspection open items. In 1987, TVA identified fire-rated walls that were breached by heating, ventilation, and air conditioning (HVAC) ducts without fire dampers. This was a violation of fire protection requirements in regard to separation of redundant trains. The staff issued an Allegation Evaluation Report dated September 21, 1989. The staff recognizes that WBN does not meet all existing NRC requirements at this time. However, the staff considers that planned staff licensing reviews and inspections of the WBN fire protection program are adequate to ensure resolution of fire protection issues. This allegation is considered resolved.

j. OSP 86-A-0086

(1) An allegation was received by the NRC staff which stated:

Construction craftsmen intentionally destroyed equipment such as instrumentation glasses and relay cases at Watts Bar and Bellefonte. Too many craftsmen on site, particularly at Watts Bar, so there

was destruction and replacement of equipment just to give the workers something to do.

(2) This allegation was substantiated. TVA Employee Concerns Program performed an extensive investigation, ECP-86-WB-656-01 from January 14, 1987 through April 12, 1989. The findings and conclusions of this report were reviewed by the NRC staff. There were numerous instances of damaged plant equipment, but only six instances were identified as possibly being intentional. WBN has improved its inspection and surveillance activities regarding housekeeping. Also, training has been conducted to remind the employees and managers of their shared responsibilities regarding housekeeping and protection of equipment which could be damaged. This allegation is considered resolved.

k. OSP 86-A-0098

(1) An allegation was received by the NRC staff which stated:

Relaxation of commitments to NRC regarding cleaning and flushing procedures.

(2) This allegation was not substantiated. The concern was at Sequoyah Nuclear Plant with respect to NRC commitment for cleaning and flushing activities. This concern was determined potentially generic by TVA to Watts Bar Nuclear Plant (WBN). TVA has evaluated the concerns regarding cleaning and flushing commitments and requirements as applied to WBN in their Employee Concerns Special Program (ECSP) Subcategory Report 26000 "Flushing and Piping Valve Design" Element 214.0. TVA has determined that the procedures adequately address the requirements of ANSI Standard N45.2.1 which identifies the cleaning methods. TVA General Construction Specification G-39 identifies the cleanliness requirement to specific WBN fluid systems and WBN Quality Control Test Procedure QCT-4.36 defines the procedures for cleaning and flushing fluid handling systems. The staff concurs with the TVA's assessment. Therefore, this allegation is considered resolved.

l. OSP 86-A-0125

(1) An allegation was received by the NRC which stated:

The resolution of an Inspection and Rejection Notice (IRN) on Hanger 2070-2-70-171 was not accepted, instead a Nonconformance Report (NCR) was written.

(2) This allegation was substantiated. The TVA Employee Concerns Program performed an investigation into the concerns expressed by the alleger. This investigation, concern number ECP-86-WB-833-01, revealed that the alleger wanted to use the IRN method to document a discrepancy not within the scope of the assigned inspection. This was not accepted by his management, who requested that the NCR method of documenting a deficiency be used. An NCR number 6950 was issued in accordance with WBN-QCI-1.02, "Control of

Nonconforming Items," Revision 15, and the weld problem identified was corrected.

This concern appears to be a difference of opinion on how to handle a nonconforming item during inspections. In this case, it appears the proper method of handling the discrepancy was used.

This allegation is considered resolved.

m. OSP 86-A-0138

(1) An allegation was received by the NRC staff which stated:

Test acceptance criteria and documentation requirements for (a) surveillance instruction (SI) testing and (b) preventative maintenance (PM) testing were inadequate.

(2a) This allegation was substantiated. During the inspection of this allegation it was determined that NRC had previously evaluated the adequacy of SIs at Watts Bar. The NRC's September 1985 Systematic Assessment of Licensee Performance (SALP) report stated that plant staff reviews of SIs had not adequately identified significant deficiencies involving Technical Specification (TS) compliance. The NRC also identified a Severity Level IV violation during its review of the SI program as documented in NRC Inspection Report 50-390/85-32-02. TVA has made programmatic changes to ensure compliance to commitments made to the NRC in response to the April 1985 violation.

TVA has also taken the following action at WBN to ensure adequacy of SIs in response to the SALP report:

- All mode 5 and 6 SIs, except those on hold for TS change requests, are reviewed by the Plant Operations Review Committee and approved by the Plant Manager.

- A checklist was developed to evaluate the initial performance of all SI performed after May 1985.

- A second checklist was developed to evaluate implementation of multiple surveillance requirements.

- A third checklist was developed to document all System Operating Instructions (SOIs) referenced in mode 5 and 6 SIs.

- Quality Assurance performed a parallel and post review of 10 percent of all mode 5 and 6 SIs.

- QA performed parallel review of modes 1 through 4 SIs to evaluate plant staff SI reviews.

Based on the review of licensee activities to improve the SI program, this portion of the allegation is resolved.

(2b) The Preventive Maintenance (PM) program was reviewed in the Nuclear Manager's Review Group (NMRG) Report R-86-02-NP5. The NMRG report included an evaluation and assessment of preventive maintenance at WBN. As a result of deficiencies identified in the PM program, the program was restructured to allow PM performance modification and frequency adjustment, as necessary. Based on the NMRG identified deficiencies, recommendations, and PM program upgrade activities, this portion of the allegation is considered resolved.

n. OSP 88-A-0002

(1) An allegation was received by the NRC staff which stated:

TVA has recently changed the qualifications to be a foreman to include a high school diploma or GED. It is not fair to allow a previously assigned foreman to continue as foreman if he did not have a high school diploma or GED.

(2) This allegation was substantiated. TVA as part of the TVA Management and Personnel Subcategory Report 71700, "Personnel Qualifications," found that a number of foremen and general foremen did not have a high school diploma or the equivalent, as required by the Nuclear Quality Assurance Manual (NQAM) and ANSI 18.1. Therefore, the requirements of the NQAM and ANSI 18.1 were incorporated in the appropriate procedures. This led to the changing of education level requirements for general foremen and foremen. The inspector reviewed the status of the licensee's corrective actions regarding the foremen and general foremen identified as not meeting the ANSI 18.1 and NQAM requirements for a high school diploma or equivalent. Progress was made in this area in that only one foreman presently does not meet this requirement. A memorandum was issued on December 14, 1987 which stated: As of January 1, 1989 all employees in the foreman or general foreman positions must have a high school diploma or equivalent. As discussed above, only one foreman at WBN does not meet that requirement and he is presently in training to obtain a GED equivalent certification.

This allegation is considered resolved.

o. OSP 88-A-0035

(1) An allegation was received by the NRC staff which stated:

Management practices as related to security personnel are inadequate at Watts Bar.

(2) This allegation was not substantiated. Some of the alleger's concerns are addressed in Employee Concerns Special Program (ECSP) Subcategory Report 31200. The rest of the concerns are addressed in the Office of the Inspector General (OIG) Programmatic Review Report dated September 2, 1987. In addition, all the concerns are specifically addressed in a TVA memorandum from Richard A. Hardin, Site Security, Watts Bar Nuclear Plant to G. G. Brantley, Site Representative, Employee Concerns Program, dated September 13, 1989. The staff

has determined that TVA's evaluation of the 18 concerns is adequate. Therefore, this allegation is considered resolved.

p. OSP 88-A-0045

(1) An allegation was received by the NRC staff which stated:

10 CFR 50.59 review process is inadequate because the reviewers do not have the broad experience or backgrounds necessary to determine the effect of one-system on another. The reviewers do not have systems training or familiarity of the FSAR accident analyses and therefore, cannot perform adequate 50.59 reviews.

(2) This allegation was not substantiated. The requirements of 10 CFR 50.59 do not apply to holders of construction permits, only to licensed operating plants. However, WBN has implemented a Design Baseline Verification Program (DBVP). The purpose of this program is to provide a baseline for plant licensing, design basis and plant configurations. The baseline provides a complete and current set of design criteria documents and system descriptions against which future plant changes may be evaluated. As WBN approaches fuel loading, the design change portion of the DBVP will incorporate the additional requirements needed for an operating plant (e.g., unreviewed safety question determination). Prior to issuance of an operating license the 10 CFR 50.59 review process will be inspected by the NRC to ensure its adequacy and proper implementation. This allegation is considered resolved.

q. OSP 89-A-0039

(1) An allegation was received by the NRC staff which stated:

TVA has implemented ANSI N18.7 1976 as opposed to N45.2 as required by the topical report.

(2) This allegation was not substantiated. During the inspection of this allegation the NRC inspector interviewed the alleger to discuss any specifics of the concern. The alleger stated that the concern had been with TVA's proposal to implement an ANSI N18.7 quality assurance program in lieu of the N45.2 program. Since the proposal never materialized, the allegation was withdrawn. However, the inspector reviewed the TVA Topical Report, ANSI N18.7/3.2, N45.2, and the associated daughter standards. It was determined that the requirements stated in the N45.2 standards are incorporated into ANSI N18.7/3.2 by reference. As a result, a commitment to ANSI N18.7/3.2 during the construction period would only enhance or add to the programmatic requirements. This allegation is considered resolved.

r. OSP 89-A-0040

(1) An allegation was received by the NRC staff which stated:

Administrative Instruction (AI) 6.1 has been changed to delete Quality Assurance (QA) inspection of completed surveillance data

packages. Graded QC requirements are being implemented prior to a change to the Nuclear Quality Assurance Manual (NQAM) being approved or the wait period being waivered.

(2) The allegation that AI 6.1 had been changed was substantiated, and the allegation concerning graded approach for QC was not substantiated. The concern appears to originate from confusion of the requirements of the NQAM, Part 2, Section 4.5, Revision 1. The NQAM does not require a review of completed surveillance instructions data by QA. An Instruction Change Form (ICF) Number 89-061 was issued on February 22, 1989 which deleted QA review of completed surveillance instruction data. This ICF was reviewed and approved by the appropriate personnel, including the Plant Operations Review Committee. The NRC staff reviewed ICF Number 89-061 and NQAM, Part 2, Section 4.5, Revision 1 and concurred that all the actions taken in this case appear to be correct. Graded QC requirements have not been implemented at WBN, although they are being discussed they will not be implemented until approval is obtained for a revision of the NQAM from the NRC. These allegations are considered resolved.

3. Exit Interview

The inspection scope and findings were summarized on September 29, 1989 with the personnel indicated in paragraph 1. The Team Leader described the areas inspected and discussed the status of each allegation reviewed. Also, discussions were held concerning the need to improve communications between supervisory and staff personnel, especially in the handling of concerns by TVA staff members. It was noted that excessive manpower and time were being utilized by both TVA and the NRC in order to solve concerns which were attributable to a lack of adequate communications between supervisors and staff. The licensee did not identify as proprietary any of the material provided to or reviewed by the inspectors during this inspection.