

## UNITED STATES NUCLEAR REGULATORY COMMISSION 10/18/90 WASHINGTON, D.C. 20555

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Docket Nos. 50-390 and 50-391

Mr. Oliver D. Kingsley, Jr.
Senior Vice President, Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: INSPECTION OF THE WATTS BAR QA RECORDS AND Q-LIST CORRECTIVE ACTION PROGRAMS, NRC INSPECTION REPORT NOS. 50-390/90-08 AND 50-391/90-08

Enclosed is the report prepared for the team inspection conducted by Mr. J. J. Watt and other NRC representatives on April 2-6, 1990, at the Watts Bar Nuclear Plant (WBN) of activities authorized under NRC Construction Permit Numbers CPPR-91 and CPPR-92. The inspection focused on the progress and status at WBN in implementing Corrective Action Programs (CAPs) for Quality Assurance (QA) Records and a new Q-list. The inspection findings were discussed with members of your staff on April 6, 1990. The NRC followup on the inspection findings will be conducted under the cognizance of Region II.

The NRC inspectors performed selective examinations of procedures, records, and facilities, observed activities in progress, and conducted interviews to evaluate progress in implementing the respective CAPs.

The inspection determined that implementation had been initiated for the CAPs developed to correct previously identified deficiencies in the Q-List and QA Records at WBN. However, the NRC is concerned that the implemented CAPs may not provide WBN with an acceptable Q-List and all records required for licensing when the CAPs are completed.

Based on this inspection, the NRC has the following specific concerns:

(1) At the time of the inspection, it was not clear to the inspectors that the implemented QA Records CAP would allow WBN to demonstrate to the NRC that it had all records required for licensing. This concern stems from the significance of past record deficiencies, the fact that methods for performing significant program tasks were still undefined, and the potential lack of depth in evaluations as to root cause, safety significance, and extent of condition for identified problems. Additionally, the inspectors were concerned that there has not been performed, nor were there known plans to perform, an all encompassing systematic records audit to ensure that the records required by applicable codes and standards will be available for licensing. TVA should conduct a review to identify missing records. All missing records should be reported to the NRC along with TVA's proposed resolution of the problem.

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- (2) Based on our data comparisons, TVA's reinspection of some equipment with record deficiencies was not equivalent to or better than the original inspection as had been agreed to by TVA.
- (3) Based on our interviews with personnel from TVA's user organizations, TVA had not ensured that the new Q-List will be acceptable to the users. Lack of user acceptance of past Q-Lists helped contribute to the establishment of the Q-List CAP.
- (4) Some activities important to the success of these CAPs appear to be scheduled too late to allow the required coordination and provide effective feedback for problem resolution. Implementation of the Q-List and performance of root cause and trend analysis of QA records deficiencies by Nuclear Engineering are primary examples.

Three unresolved items and five inspection followup items were identified during the inspection and are discussed in the enclosed inspection report.

When you have reviewed the information in this cover letter and the attached inspection report, we would like to meet with you to discuss your plans relative to the inspection findings. It is requested that you contact us when you are ready to meet.

In accordance with Section 2.790 of the NRC's "Rules and Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Sincerely,

Bruce A. Wilson, Chief TVA Projects

Enclosure: Inspection Report 50-390, 391/90-08

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