



Site: Wab River
Watts Bar Nuclear Plant

MAR 08 1993

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

Gentlemen:

In the Matter of the Application of)
Tennessee Valley Authority)

Docket Nos. 50-390
50-391

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT 390, 391/93-06 - REPLY TO NRC CONCERN - QUALITY ASSURANCE (QA) RECORDS CORRECTIVE ACTION PROGRAM (CAP) (TAC M71923)

The purpose of this letter is to respond to NRC's letter of February 5, 1993, which identified a concern with the Conduit Support Record Plan developed by the QA Records CAP. Specifically, the concern deals with the designation of non-QA records as alternate licensing basis QA records for some missing construction records.

The QA Record Plans for the various WBN hardware elements are primarily intended to serve as road maps for users to determine the QA Records related to construction that are being relied upon as a licensing basis. A general note placed at the bottom of the Conduit Support Record Plan transmitted to NRC in TVA's August 24, 1992 letter did not adequately reflect this intent. As a result of an oversight, the note stated "... records denoted in bold print represent those documents serving as the primary QA Records for demonstrating qualification." This suggests that those records denoted in bold, such as corrective action tracking documents (CATDs), are QA Records.

TVA has developed several initiatives, including actions to address the subject concern, to ensure the technical adequacy of the record plans. To address NRC's specific concerns, the generic note discussed above has been revised to read in part "... records denoted in shade print represent those documents producing the primary QA records for demonstrating qualification." Therefore, in the case of a CATD, the QA records relied upon are those that

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substantiate the corrective actions identified. These QA records are typically calculations, design change documents, and CAQRs/PERs. Further, as described in TVA's transmittal of January 28, 1993, which transmitted 14 record plans, records referenced on record plans that are not specifically designated as QA Records will be attached to the validated record plans when submitted to Document Control and Records Management for permanent retention and indexing. Finally, several meetings have been conducted with the Record Completion Team leads for the QA Records Project regarding this issue. The technical quality and accuracy of the QA Record Plans, as well as their importance to the overall licensing process, has been reemphasized.

As discussed in TVA's January 28, 1993 letter, the record plans will be validated to provide assurance that the scope and content of the referenced records are adequate. In addition, the adequacy of the record plans is being independently verified by the Quality Assurance department. These initiatives had been developed prior to the subject inspection period and, together with the actions discussed above, provide confidence that the record plans will be technically accurate. The record plans are currently in the final stages of validation by the QA Records Project and verification by Quality Assurance.

Validation and verification of the Electrical Cable Record Plan were completed and this record plan made available for NRC inspection on March 1, 1993. As stated in TVA's February 23, 1993 letter which transmitted the validated Cable Record Plan, validation and QA independent verification of the remaining record plans will be concluded in conjunction with the 75% schedule milestone for the CAP/Special Program to which the record plan applies. Record plans for other Elements (i.e., record plans not associated with CAPs/SPs) and record plans for CAP/SPs which are already 75% complete will be validated and verified prior to the QA Records CAP completion milestone. The results of the QA independent verification activities will be evaluated by the QA Records Project and any additional changes to the plans will be incorporated.

If you have any questions, please telephone Paul L. Pace at (615) 365-1824.

Very truly yours,



William J. Museler

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cc: NRC Resident Inspector
Watts Bar Nuclear Plant
P.O. Box 700
Spring City, Tennessee 37381

Mr. P. S. Tam, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. B. A. Wilson, Project Chief
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323