



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

October 19, 1993

Docket Nos.: 50-390 & 50-391
Construction Permit Nos.: CPPR-91 & CPPR-92

Tennessee Valley Authority
Attn: Dr. Mark O. Medford, Vice President
Technical Support
3B Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

Dear Dr. Medford:

SUBJECT: WATTS BAR NUCLEAR PLANT UNIT 1 — NRC INSPECTION REPORT NO. 50-390/
93-203 AND 50-391/93-203 (TAC M83748)

We are forwarding the enclosed inspection report documenting the examination of the Program for Assurance of Completion and Assurance of Quality (PAC/AQ), performed August 30 through September 3, 1993, involving activities authorized by Construction Permit No. CPPR-91 for the Watts Bar Nuclear Plant (WBNP), Unit 1. The Nuclear Regulatory Commission (NRC) staff from the Performance and Quality Evaluation Branch of the Office of Nuclear Reactor Regulation, along with other members of the NRC, and a contractor, conducted the inspection. An exit meeting was held on September 3, 1993, during which we discussed the team's findings with members of your staff.

The primary focus of the inspection was to assess the adequacy of Phases I, II, and III of the PAC/AQ program. This inspection consisted of verifying the proper identification of commitments contained in the Watts Bar Final Safety Analysis Report (FSAR) through Amendment 68, Safety Evaluation Reports (SERs), WBNP responses to NRC correspondence, violations and deviations, Generic Letters, and Bulletins (Phase I); confirming the identified commitments had been captured in the appropriate site implementing documents (Phase II); and evaluating the technical adequacy of the commitments as captured in the implementing documents (Phase III). The remaining PAC/AQ activities involving Phase IV (Vertical Slice Reviews) and Phase V (Oversight of Operational Readiness) will be evaluated during future inspection efforts.

In general, the team found that Phase I, II, and III activities of PAC/AQ were effective in assuring the identification of regulatory commitments and the translation of those commitments into implementing documents. The team determined that your process for capturing commitments under PAC/AQ was comprehensive and well implemented. The team also found that the process for the identification of implementing documents and the establishment of their technical adequacy was good.

The team identified one deficiency, one unresolved item, one weakness, and made several observations concerning your PAC/AQ program. The deficiency

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involved the translation of PAC/AQ commitments into the Licensing Department's Tracking and Reporting of Open Items (TROI) program that has provided the consolidated mechanism for tracking commitments since 1989. The team determined that commitments from the FSAR and SERs, although transferred to the TROI system, were not being actively maintained and that sources of the identified commitments (source noting) had not been accomplished. This was contrary to the commitment made in TVA's letter to the NRC dated November 8, 1991. During the conduct of the inspection, a TVA letter was sent to the NRC modifying the earlier commitment. The unresolved item involved TVA's use of an apparently non-conservative value for the instrument time delay associated with the low-flow reactor trip set point. Subsequent to the team's identification of this potentially safety-significant issue, TVA initiated a Potential Area of Concern Recommendation (PACR-0389) to document this condition and provide a technical resolution. One weakness identified by the team was the failure of TVA to source note documents to ensure that commitments embodied in the site documents were not inadvertently revised. Specifically, source noting of implementing documents to reflect regulatory commitments for those commitments that were transferred to licensing, has remained incomplete since turnover of the PAC/AQ commitments database to the Licensing organization. The team found this significant because many of the implementing documents used by the PAC/AQ organization to verify that commitments had been addressed have been superseded or revised since November 1991 when Phase II was completed. In response to this issue, TVA initiated actions to facilitate the source noting of the applicable implementing documentation in accordance with their revised commitment incorporation process. The observations are described in the report.

The team determined that, in general, Phases I, II, and III of the PAC/AQ program were acceptable with the exception of the items noted above.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room. No response to this letter is required. Any enforcement actions resulting from the inspection will be issued by Region II.

Should you have any questions concerning this inspection, please contact NRR Project Manager Peter Tam (301 504-1451) or the inspection team leader Robert Latta (301 504-1023).

Sincerely,

Original signed by:

Steven A. Varga, Director
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosure:

Inspection Report 50-390/93-203
50-391/93-203

cc: See next page

For distribution and concurrence see next page

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