

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
1630 Chestnut Street Tower II

May 22, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

Amendments 54 and 55 to the Watts Bar Final Safety Analysis Report (FSAR) included revisions to FSAR Chapter 13, "Conduct of Operations." These revisions were necessary in order to reflect TVA's recent reorganization.

We have discovered that an additional change (enclosed) is necessary to Section 13.4, "Review and Audit" with respect to the description for the Nuclear Safety Staff. Appendix 13.4A, "Nuclear Safety Review Board Charter" should be deleted since it refers to the previous organizational structure. This change will be reflected in the next amendment to the FSAR (Amendment 56).

If you have any questions concerning this matter, please get in touch with D. B. Ellis at FTS 858-2681.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Damer

J. A. Damer, Chief
Nuclear Licensing Branch

Sworn to and subscribed before me
this 22nd day of May 1985

Paulette H. White

Notary Public

My Commission Expires 8-24-88

Enclosure

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

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APPENDIX 13.4A

CHARTER

NUCLEAR SAFETY REVIEW BOARD

I. PURPOSE

The Nuclear Safety Review Board (NSRB) is established for the purpose of advising the Manager of Power on the adequacy and implementation of TVA nuclear safety policies and programs, and to determine that these policies and programs are in compliance with regulatory requirements composed by the NRC and other regulatory agencies. The NSRB shall function during the planning, design, construction, and operation phases of all TVA nuclear plants.

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II. DEFINITIONS

The following definitions are applicable specifically to this charter:

- A. Audit - A formal examination undertaken to determine the adequacy of established controls and to verify conformance with controls, including periodic comprehensive evaluations of plant design, construction, and operations conducted by personnel not having direct responsibilities in the areas audited.
- B. Evaluate - To appraise or determine the worth of.
- C. Investigation - An examination or search to determine facts.
- D. May - Denotes option at the discretion of the NSRB.
- E. Modification - Any change to a structure, system, component, or procedure.
- F. Review - A deliberately critical examination, including monitoring of plant operation, formal independent evaluations of certain contemplated actions, and after-the-fact investigations of anomalies.
- G. Safety-Related - Those plant features necessary to assure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safely shutdown condition, or the capability to prevent or mitigate the consequences of accidents which could result in offsite exposures comparable to the guideline exposures of AEC Regulations 10 CFR Part 100.

N. Shall - Denotes a requirements.

- I. Unreviewed Safety Question - A proposed change, test, or experiment shall be deemed to involve an unreviewed safety question (1) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased; or (2) if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created; or (3) if the margin of safety as defined in the basis for any technical specification is reduced. (Reference 10 CFR 50.59)

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III. MEMBERSHIP

A. Appointments

The NSRB shall consist of a chairman and five or more other members appointed or approved by the Manager of Power. Appointments shall be for an indefinite period and shall include at least one outside consultant, as well as representatives from the Office of Engineering Design and Construction, Division of Environmental Planning, Division of Power Production, and Division of Power Resource Planning. No more than a minority of members shall be from any one division. The chairman shall appoint a secretary.

B. Qualifications

1. General Requirements - NSRB members shall possess competence in one or more fields of nuclear technology and shall be capable of recognizing and evaluating potential nuclear safety problems and their effects. TVA members shall be selected from among those regularly involved as supervisors or staff specialists in nuclear plant design, operation, safety analysis, and related activities.
2. Minimum Qualifications - Individual members of the NSRB shall hold bachelors or advanced degrees in engineering or applicable science or the equivalent in educational training and work experience. NSRB members shall collectively have the capability required to review problems or the assess adequacy of reviews by others in the following areas:
 - a. Nuclear power plant operations
 - b. Nuclear engineering

- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Electrical engineering
- h. Mechanical engineering
- i. Administrative controls and QA practices

The NSRB shall have access to TVA specialists in any appropriate field associated with the unique characteristics of the nuclear plant involved and shall be provided assistance from appropriate divisions as necessary to accomplish its responsibilities in a timely manner.

IV. RESPONSIBILITIES

A. General

The NSRB shall be responsible for advising the Manager of Power on the adequacy and implementation of TVA nuclear safety policies and programs, and for determining that those policies and programs are in compliance with regulatory requirements imposed by the Nuclear Regulatory Agency and other regulatory agencies. In general, the review, audit, and investigation functions shall be performed independently of the NSRB. The NSRB shall be responsible for evaluating the results of such activities to determine that all nuclear safety-related aspects are being adequately considered. In addition, the NSRB may conduct review or investigations of any nuclear safety-related activity in order to evaluate the TVA nuclear safety program. It shall be responsible for identifying problems and for recommending solutions through the Manager of Power to appropriate management. Individual members shall keep the NSRB appraised of nuclear safety-related activities which are brought to their attention, and shall be responsible for identifying safety problems for review by the NSRB. Further responsibilities shall include the following:

- a. Operating programs, plans, and procedures to meet nuclear safety requirements.
- b. Information indicating that there may be a deficiency in a design or operational aspect of safety-related systems or components.

- c. Proposed modifications on safety-related equipment, systems, operating procedures, Technical Specifications, or licenses.
- d. Proposed tests, experiments, and their results, when such tests or experiments may constitute an unreviewed safety question.
- e. Violations of Technical Specifications, license requirements, procedures or instructions having safety questions.
- f. Reportable occurrences as described in the Technical Specifications.
- g. Significant operating abnormalities or deviations from normal and expected performance of plant equipment.
- h. Unusual events as described in the Technical Specifications.
2. The NSRB shall review reports and evaluations performed by cognizant organization elements on the following subjects and, as deemed necessary, shall recommend corrective action through the Manager of Power to appropriate management.
- a. Proposed modifications to safety-related equipment, systems, and operating procedures to determine the existence of unreviewed safety questions.
1. The NSRB shall establish communication channels with the Office of Power Quality Assurance and Audit Staff and with each Plant Operations Review Committee, and develop means to ensure the timely and continuous exchange and review of safety-related information. Arrangement shall also be made to ensure receipt by the NSRB of audit reports from the Office of Engineering Design and Construction.
2. The NSRB shall be responsible for obtaining technical assistance, as necessary, to perform reviews and investigations of nuclear safety-related matters.
- B. Planning, Design, and Construction Phases
- During the planning, design, and construction phases, the NSRB shall determine that adequate procedural mechanisms exist to ensure that the following areas are being reviewed with respect to nuclear plant safety by cognizant TVA organizations. The NSRB shall make its determination of adequacy of procedural mechanisms and review by cognizant TVA organizations by reviewing audit reports, inspection reports,

reports of design deficiencies, and management procedures; and by holding discussions with appropriate organization representatives. The NSRB may also conduct separate reviews, as deemed necessary, and shall recommend corrective action through the Manager of Power to appropriate management.

1. Design features of TVA nuclear plants and equipment which may present potential nuclear safety problems or significant departures from established nuclear plant design practices.
2. Safety analyses, licensing documents, and reports related to nuclear plant safety.
3. Quality assurance programs.
4. TVA policy and practices for nuclear plant personnel selection, testing, and training.
5. Preoperational and initial startup test programs, procedures, and test results.

C. Operating Phase

1. During the operating phase the NSRB shall determine that adequate procedural mechanisms exist to ensure that the safety related subjects are being reviewed with respect to
 - b. Proposed changes in Technical Specifications or licenses.
 - c. Reports of abnormal occurrences.
 - d. Reports of violations of Technical Specifications, license requirements, internal procedures or instructions having safety significance.
3. The NSRB shall review the operating phase audit program sufficiently to ensure that audits are being accomplished in accordance with Technical Specifications and ANSI N18.7. 'Standard for Administration Controls for Nuclear Power Plants.'

V. AUTHORITY

The NSRB shall be advisory to the Manager of Power in matters relating to nuclear plant safety and shall have the authority to perform the responsibilities described herein.

- A. The NSRB shall have access to all TVA nuclear facilities, as well as design, construction, and operating records

necessary to perform its assigned functions. Onsite inspections of construction and operations may be conducted as necessary.

- B. Members shall have access to advice and services of technical specialists within their respective organizations and outside consulting services are available, as required, through contractual arrangements.
- C. The NSRB may initiate special studies and investigations as required to define and to resolve problems related to nuclear plant safety.

VI. METHOD OF OPERATION

A. Meeting Frequency

The NSRB shall meet at least quarterly or at more frequent intervals at the call of the NSRB Chairman. At the request of an NSRB member or a Plant Operations Review Committee, the NSRB shall be promptly convened to review and to evaluate those matters deemed essential to the safe operation of the plant.

B. Quorum

A quorum shall consist of four members for all meetings, no more than a minority of which shall be from any one division.

C. Reports

Draft minutes of all meetings shall be distributed to each NSRB member for review and correction. Following approval by all members, the final minutes, along with a summary report, shall be distributed to the Manager of Power; to each NSRB member; and to other management elements as directed by the Manager of Power.

D. Guidelines

The NSRB shall develop and document, for approval by the Manager of Power, detailed guidelines for the routine performance of functions necessary to fulfill its responsibilities within the scope of this charter.

E. Revisions

On the majority approval of the members, the NSRB Chairman may recommend changes in this charter to the Manager of Power for approval.