

U.S. Nuclear Regulatory Commission
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Enclosures

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ENCLOSURE 1
WATTS BAR NUCLEAR PLANT UNIT 1
RESPONSE TO NRC'S JANUARY 13, 1995, LETTER TO TVA
SUPPLEMENTAL RESPONSE TO NRC DEVIATION 50-390/94-66-02

BACKGROUND

TVA's letter to NRC dated December 16, 1994, responded to Notice of Deviation 50-390/94-66-02. NRC reviewed the response and in a letter to TVA dated January 13, 1995, made a comment as to whether procedure changes are being made without adequate regard to commitments they implement. In this letter, NRC also commented on the documentation requirements for Vertical Slice Review (VSR) Discrepancy Report (DR) closure packages.

The first comment identifies that similar problems with maintaining control over corrective actions were documented in NRC Inspection Report 50-390/94-75, QA Assessment Report No. NA-WB-94-0045 and Problem Evaluation Report (PER) WBP940101. The comment expressed by NRC in Inspection Report 50-390/94-75 was that two cases were found where Employee Concerns Special Program (ECSP) corrective actions were negated without consideration of the previous corrective actions that were put in place. NRC was concerned that the control of procedure changes does not adequately consider previous corrective actions implemented by the procedure or its predecessor procedures. Based on this concern, TVA responded in a letter dated January 13, 1994. This response reiterated a discussion in TVA's August 20, 1993, letter to NRC regarding the Lookback Project associated with Corrective Action Tracking Documents (CATDs) and made the following commitment:

"WBN will conduct an assessment of the implementation of the source noting requirements contained in SSP-2.03, "Administration of Site Procedures," and SSP-2.04, "Source Requirements Identification and Tracking," (excluding CATDs and NRC commitments addressed by the Program for Assurance of Completion and Assurance of Quality (PAC/AQ)). The assessment will be led by Nuclear Assurance, with assistance from owners of the affected corrective action processes. This assessment will be completed by March 31, 1994. Any adverse conditions will be documented in accordance with the WBN Corrective Action Program, as necessary."

The assessment which implemented this commitment was NA-WB-94-0045. PER WBP940101 was initiated based on the assessment and resulted in procedural changes to Site Standard Practice (SSP) 2.03 and SSP-2.04 to strengthen the controls associated with maintaining implementation of corrective actions in procedural documents.

DISCUSSION:

The following discussion addresses each element of NRC's comments:

NRC Comment:

"With respect to your response to Part 1 of the Deviation, we remain concerned that procedure changes are made without adequate regard to commitments (corrective actions) they implement."

Response:

There are two principal areas for which TVA must demonstrate control over programmatic corrective actions. These areas are commitments made in submittals to NRC and corrective steps made to resolve CATDs. Currently these actions are being controlled through the use of source notes in the documents which implement the corrective actions. TVA has also elected to control programmatic corrective actions initiated for Watts Bar under the TVA Corrective Action Program and Nuclear Experience Review Program in a similar manner. The purpose of the source noting is not to "lock-in" to an action on a permanent basis but rather, to provide a means through which management can make informed decisions when changes to existing processes are required and to ensure that, when appropriate, NRC is properly notified of the approved changes.

For CATDs and NRC commitments, TVA is currently implementing programs which ensure that the programmatic corrective measures have been implemented and controlled. The Lookback Project discussed in TVA's August 20, 1993 letter, provides assurance that programmatic corrective actions related to CATDs are implemented and controlled. The implementation of the Design Baseline and Verification Program (DBVP) Corrective Action Program (CAP) and in particular, the element of the CAP which requires the source noting of the programmatic commitments cataloged by PAC/AQ, ensures conformance with commitments made in responses to NRC. When both of these programs are completed, reviews with appropriate scope and depth will have been performed to ensure that programmatic commitments are implemented and controlled such that inadvertent deviation from commitments should not occur.

NRC Comment:

"NRC Inspection Report 50-390/93-75 raised the same concern based on NRC inspections of the Employee Concern Special Program corrective actions."

Response:

TVA's January 13, 1994, letter to NRC addressed the concerns expressed in Inspection Report 50-390/93-75. This response addressed the scope of the Lookback Project and stated that the CATDs identified by NRC in the Inspection Report were reopened to address the NRC concerns. Since the condition cited in Notice of Deviation 50-390/94-66-02 addressed a commitment made in a submittal to NRC and the planned actions associated with CATDs and the Lookback Project had been addressed with NRC, the response to the Notice of Deviation specifically addressed commitments made in submittals to NRC.

NRC Comment:

"QA Assessment Report No. NA-WB-94-0045 documented your committed review of our concern for non-employee concern corrective actions and resulted in the issuance of WBP940101 to address program weaknesses in this area. Your response does not address this corrective action document and does not explain how the procedure writers were able to delete the commitment from the procedure without changing the source note, or why the management reviews and commitment tracking system closure process failed to identify that this commitment had not been completed."

Response:

The statement from the Watts Bar Nuclear Performance Plan (NPP), Volume 4, regarding significance reviews of DRs was not captured and tracked as a commitment when the NPP was initially submitted or when it was revised. Also, the PAC/AQ Program reviewed the NPP, Volume 4, for commitments and identified 75 commitments, including eight commitments not being tracked in the Tracking and Reporting of Open Items (TROI) system. PAC/AQ commitments were identified and retrieved from the body of the NPP and included more than those listed in Appendix E of the NPP. The statement regarding DR reviews in the NPP was not captured in the PAC/AQ review because the commitment definition utilized by PAC/AQ typically did not encompass statements of this nature. The PAC/AQ reviews concentrated on action statements, particularly statements committing to future actions such as "will be revised" or "will be installed."

Revision 4 of Administrative Instruction (AI) 11.3, "Disposition of Vertical Slice Review Team Information Request, Discrepancies, and Adverse Trends," did not reference the NPP, nor in any way uniquely identify the guidelines regarding significance reviews as a commitment. Therefore, there was nothing to signal the procedure writers that the deletion of the guidelines would compromise a commitment. As stated in TVA's letter to NRC dated December 16, 1994, responding to Notice of Deviation 50-390/94-66-02, the cause for the omission of the significance review guidelines in the SSP is that an evaluation performed by TVA on the 165 DRs designated as "significance not yet determined" showed that the discrepancies still needing a design-significance review would be resolved under an existing Corrective Action Program (CAP), Special Program (SP) or other corrective action document. Therefore, the procedure writers believed that there was no need to incorporate the significance review process into SSP-4.A, "Disposition of Vertical Slice Review team Information Request, Discrepancies, and Adverse Trends." Based on the evaluation of the 165 DRs, this decision, at that time, was technically reasonable.

Considering the preceding discussion, TVA acknowledges that the one area which may not be appropriately addressed by the DBVP CAP activities is the Watts Bar NPP Volume 4. Therefore, NPP Volume 4 has been reviewed by PAC/AQ to identify statements of completed actions; statements similar to the statement regarding significance reviews. TVA will verify by April 7, 1995, whether the statements are implemented, tracked as commitments, and properly maintained. In addition to this review, and to provide added assurance that the use of source notes will ensure ongoing compliance with commitments, TVA will review the procedures associated with the use of source notes for the control of commitments. Primarily this review will assess the consistency and adequacy of the guidelines in the various procedures. Note that this will only apply to procedures associated with commitments made in submittals to NRC and CATDs. Consideration of the conclusions of QA Assessment NA-WB-94-0045 will be an element of the procedure review. This review and any required changes to the procedures will be completed by April 7, 1995.

For the second comment made by NRC regarding closure package documentation, TVA contacted the Region II staff on February 3, 1995, in an effort to better understand NRC's position. From this discussion it was concluded that the following documentation should be included in future DR closure packages. A revision to SSP-4.A will be made by March 24, 1995, to establish guidelines for inclusion of this documentation in the DR closure packages:

1. When the corrective action for a DR is implemented by an element of a Problem Evaluation Report (PER) or a Significant Corrective Action Report (SCAR), the appropriate sections of the PER or SCAR that direct implementation of the corrective action should be in the closure package. In addition, the documents which prove that the required corrective action has been implemented should also be included in the package.

2. When the programmatic corrective actions required for disposition of a DR are encompassed within the scope of a CAP, the section of the CAP which addresses the corrective action required to be implemented for resolution of the DR, should be included in DR closure packages.

ENCLOSURE 2

SUMMARY OF COMMITMENTS

1. Therefore, NPP Volume 4 has been reviewed by PAC/AQ to identify statements of completed actions; statements similar to the statement regarding significance reviews. TVA will verify by April 7, 1995, whether the statements are implemented, tracked as commitments, and properly maintained.
2. In addition to this review, and to provide added assurance that the use of source notes will ensure ongoing compliance with commitments, TVA will review the procedures associated with the use of source notes for the control of commitments. Primarily this review will assess the consistency and adequacy of the guidelines in the various procedures. Note that this will only apply to procedures associated with commitments made in submittals to NRC and CATDs. Consideration of the conclusions of QA Assessment NA-WB-94-0045 will be an element of the procedure review. This review and any required changes to the procedures will be completed by April 7, 1995.
3. A revision to SSP-4.A will be made by March 24, 1995, to establish guidelines for inclusion of this documentation in the DR closure packages:
 1. When the corrective action for a DR is implemented by an element of a PER or a SCAR, the appropriate sections of the PER or SCAR that direct implementation of the corrective action should be in the closure package. In addition, the documents which prove that the required corrective action has been implemented should also be included in the package.
 2. When the programmatic corrective actions required for disposition of a DR are encompassed within the scope of a CAP, the section of the CAP which addresses the corrective action required to be implemented for resolution of the DR, should be included in DR closure packages.