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FEB 04 1993

U.S. Nuclear Regulatory Commission
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Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - REVISION 4 TO CORRECTIVE ACTION PROGRAM (CAP)
PLAN FOR VENDOR INFORMATION

Enclosed is Revision 4 to the Vendor Information CAP Plan for the Vendor Information Program (VIP). The primary purpose of this revision is to provide changes or clarification to three specific points. The first of these is the program interface between the Q-List and the VIP. The second is the development of vendor document cross-references. The third is the "as-constructed" status of vendor drawings used to support safety-related plant activities. These points are discussed as follows:

1. The Program Interfaces outlined in Section 5.0 of the CAP identify a major interface between the VIP and the Q-List. This revision clarifies the interface with the current Q-List and the scope of the VIP. The scope of the VIP is the Q-List components specifically itemized on the Q-List with the classification "verified safety-related" as of December 1, 1992. This is consistent with previous revisions of the Vendor Information CAP. Revision 3 of this CAP states:

"The identification of safety-related components as a result of the Q-List CAP will be the basis of the VI CAP scope for Unit 1, Common, and Unit 2 necessary for Unit 1 operation. The EQIS data base will be used as the data base for the Q-List and therefore is used to develop the scope of the VI CAP."

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At the time this program interface was originally defined, the Q-List data base consisted of components that were specifically itemized and classified by unique identifiers. The Q-List General Notes were issued in hard copy form and enabled the user to determine the safety classification for components which were not itemized. The Q-List and the General Notes have since been added to TVA's Equipment Management System (EMS) data base, a data base which lists components with unique identifiers, in order to enhance the overall usability of the Q-List. However, now that the General Notes and the itemized components are both a part of the EMS data base, TVA wants to emphasize that the scope of the program continues to be those components itemized and classified by the Q-List as "verified safety-related" as listed in the Q-List. "Verified safety-related" refers to those components confirmed as safety-related by second-party verification through the implementation of the Q-List CAP.

TVA recognizes the need to provide appropriate vendor information for those safety-related components which are not itemized. These components and component types are addressed through the normal vendor information and/or the design control processes. These processes conform to Office of Nuclear Power Standard (ONP-STD) 2.10, "Vendor Manual Control," which was developed as part of TVA's response to NRC Generic Letters 83-28 and 90-03. Some examples of these processes are:

- Reactor Protection System components are not completely itemized. The system is under major redesign, and vendor requirements will be addressed as part of the modification control process.
- Electrical cables are not itemized but are addressed in design output via Environmental Qualification Binders.
- Some relays are not itemized, but installation is addressed in design output via approved drawings, and maintenance is addressed through instructions based on proven maintenance history.
- Terminal blocks are not itemized and classified, but are simple in design and construction and require no special vendor information.
- Pipe supports are not itemized but are addressed in design output via approved drawings.

In addition, TVA has implemented a program whereby implementing organizations will request vendor technical manuals (VTMs) on an as-needed basis when adequate information is unavailable from a controlled source.

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This revision also defines the specific Q-List as of December 1, 1992, from which the VIP will be verified. As subsequent changes are made to the Q-List through the design change process, the VIP will address vendor documentation when appropriate. This will be accomplished as a normal part of the VIP maintenance through the design change process procedures.

2. This revision changes the process for development of vendor document cross-references. Previous revisions of this CAP described a cross-referencing to be established and maintained to document the relationships between TVA documents and vendor-supplied documents that are referenced in them. This cross-reference matrix was to be manually maintained with entries made as new drawings were issued or drawings were revised referencing vendor information. While such cross-referencing would have been informative, it would have only cross-tied a limited number of vendor documents to TVA output documents. TVA is now tying the vendor information directly to the unique safety-related component identifiers listed in the EMS data base. The vendor manual user will be able to access EMS for the specific component identification and obtain a list of the actual vendor manuals which apply to that component. The EMS data base also provides vendor contract information which will lead the user to the applicable vendor-supplied drawings and documents. TVA believes that using the EMS data base in this way provides a significant enhancement to the previous document cross-referencing concept.
3. The handling of vendor drawings has been clarified. Revision 3 states that only vendor drawings which are stasured "As Constructed" or "Configuration Control Drawings" are to be used to perform safety-related work; however, some vendor drawings that depict information necessary to support safety-related site activities are not always in an "as-constructed" status. For example, logic diagrams and vendor skid assembly drawings would typically be approved by TVA and not be maintained in an as-constructed status. Therefore, this revision clarifies that all drawings used to perform safety-related activities are issued as approved design output. Information only copies of vendor drawings may be included in technical manuals.

Additional changes include the addition of a reference to a programmatic interface and minor changes such as updating procedure references and references to current data base terminology. The programmatic interface now referenced in the CAP is to the plant procedures upgrade programs for review of VTMs by plant organizations to determine if procedural changes are needed.

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NRC's review and subsequent endorsement of the revised CAP plan are requested. Please direct any questions concerning this submittal to P. L. Pace at (615) 365-1824.

Very truly yours,



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Enclosure

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