



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381

SEP 01 1995

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

Gentlemen:

In the Matter of the Application of) Docket No. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) - RESPONSE TO AUGUST 11, 1995,
REQUEST FOR ADDITIONAL INFORMATION (RAI) - WATTS BAR UNIT 1
TECHNICAL SPECIFICATIONS (TS), RELOCATION OF QUALITY ASSURANCE
REQUIREMENTS (TAC NO. M76742)

Tennessee Valley Authority, and WBN in particular, has been actively involved in industry efforts on Technical Specification Improvements (ITS) as suggested by NRC letter dated October 25, 1993. As part of this industry and WBN specific effort, WBN has been incorporating applicable approved revisions to NUREG-1431 into the draft of the WBN Unit 1 Technical Specifications. During the NRC/industry efforts in preparing the ITS, one of the improvements suggested by the industry regarded relocation of TS administrative controls. This industry generic change was designated BWOG-09. BWOG-09 was approved by the NRC on March 29, 1994. This change included relocation of many quality assurance requirements to other licensee controlled documents provided that the controls for changes to the relocated material was clearly covered under 10 CFR 50.54(a). TVA considered several options for implementing this change and determined that the proposed locations of the relocated material meet the criteria contained in BWOG-09. However, following discussion with the NRC staff on August 23, 1995, regarding the RAI, TVA agreed that it may be less cumbersome if the material was all located in the TVA Quality Assurance (QA) Plan. Therefore TVA is proposing to relocate the previously relocated material identified in Enclosure 1 to the TVA QA Plan (TVA-NQA-PLN89-A).

Enclosure 1 contains a matrix identifying the disposition of the previous Technical Specification requirements. Enclosure 2 contains the draft revised pages of the TVA QA plan to be included

9509130088 950901
PDR ADOCK 05000390
A PDR

Good
11

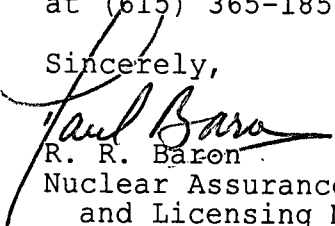
U.S. Nuclear Regulatory Commission
Page 2

SEP 01 1995

in Revision 6 of the TVA QA Plan which show the inclusion of the relocated material. Enclosure 3 contains the revised pages of the FSAR which have been included in Amendment 90 to make the FSAR consistent with the proposed changes to the TVA QA Plan.

If you should have any questions, please telephone Bruce Schofield at (615) 365-1857.

Sincerely,


R. R. Baron

Nuclear Assurance
and Licensing Manager (Acting)

Enclosures

cc (Enclosures):

NRC Resident Inspector
Watts Bar Nuclear Plant
Rt. 2, 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

U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

ENCLOSURE 1

MATRIX OF RELOCATED TECHNICAL SPECIFICATION REQUIREMENTS TO THE
TVA NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A)

TENNESSEE VALLEY AUTHORITY
NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A), REVISION 6
DESCRIPTION OF CHANGES AND DISPOSITION OF RELOCATED WBN TECHNICAL
SPECIFICATION REQUIREMENTS (REVIEWS, AUDITS, PROCEDURES, RECORD RETENTION)

Page 1 of 4

<u>SECTION NO. IN REVISION 5</u>	<u>CHANGE REFLECTED IN REVISION 6</u>	<u>JUSTIFICATION (FORMERLY IN WBN TECHNICAL SPECIFICATION (TS))</u>
Table of Contents (pages 3 and 4)	Revised page numbers as necessary	Changed page numbers due to NQA Plan revisions.
Section 4.1.3.B.5 (page 14)	Added a new first paragraph (page 15)	(WBN TS 5.5 - second paragraph, second, third, and fifth sentences.)
	Added a new fourth paragraph (pages 15 and 16)	(WBN TS 5.5.2 - first and second paragraphs. Changes were made in WBN TS text regarding qualifications and NSRB composition to be consistent with BFN and SQN TS.)
	Added Section 4.1.3.B.5.a (page 16)	(WBN TS 5.5.2.1. Site specific notations were made in the text and 24 hour notification was removed.)
	Added Section 4.1.3.B.5.b (pages 16 and 17)	(WBN TS 5.5.2.2. Added reviews of safety evaluations from WBN TS 5.5.2.3.c.)
	Add Section 4.1.3.B.5.c (page 17)	(WBN TS 5.5.2.2. Site specific notations were made in the text.)
Section 4.1.3.C.7.b (page 19)	Added item "17. Performing onsite independent technical reviews." (pages 22 and 23)	(WBN TS 5.5 - Second paragraph, first sentence) (WBN TS 5.5.2 - Third and fifth paragraphs. Composition of staff was removed for consistency with the Standard TS). (WBN TS 5.5.2.4 - Made reference to the management position that manages the independent technical review function.) (WBN TS 5.5.3.a.)

TENNESSEE VALLEY AUTHORITY
NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A), REVISION 6
DESCRIPTION OF CHANGES AND DISPOSITION OF RELOCATED WBN TECHNICAL
SPECIFICATION REQUIREMENTS (REVIEWS, AUDITS, PROCEDURES, RECORD RETENTION)

<u>SECTION NO. IN REVISION 5</u>	<u>CHANGE REFLECTED IN REVISION 6</u>	<u>JUSTIFICATION</u> <u>(FORMERLY IN WBN TECHNICAL SPECIFICATION (TS))</u>
Section 4.1.3.C.7.c.1 (page 19)	Changed "(as required by NUREG 0737)" to "(independent technical reviews)." (page 23)	To align the definition of technical review function with the Standard TS.
Section 4.1.6 (page 21)	Added item "C. The plant technical review process and PORC." (page 25)	Establishes functional responsibility at the Senior Vice President level.
Not applicable	Added a new section 9.9 and the following subsections: (pages 65 through 71)	
	9.9.1	(WBN TS 5.5 - first paragraph. Deleted last sentence as it is redundant. Site specific notations were made in the text.)
	9.9.2	(WBN TS5.5.1)
	9.9.2.A.1 and .2	(WBN TS 5.5.1.a.1 and .2)
	9.9.2.A.3	(WBN TS 5.5.1.1.b)
	9.9.2.A.4	(WBN TS 5.5.1.2.b)
	9.9.2.B.1 through .5	(WBN TS 5.5.1.b.1 through .5. Changes were made in composition to clarify titles and alternates. Qualification requirements were removed as they were redundant to existing NQA Plan commitments.)
	9.9.2.B.6	(WBN TS 5.5.1.1.a - Removed 24 hour notification.)
	9.9.2.B.7	(WBN TS 5.5.1.2.a. Listed specific programs from WBN TS 5.7.2. Removed redundancies.)
	9.9.3	(WBN TS 5.7.1.1) (WBN TS 5.5.3.a,.d,.e)

TENNESSEE VALLEY AUTHORITY
 NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A), REVISION 6
 DESCRIPTION OF CHANGES AND DISPOSITION OF RELOCATED WBN TECHNICAL
 SPECIFICATION REQUIREMENTS (REVIEWS, AUDITS, PROCEDURES, RECORD RETENTION)

<u>SECTION NO. IN REVISION 5</u>	<u>CHANGE REFLECTED IN REVISION 6</u>	<u>JUSTIFICATION (FORMERLY IN WBN TECHNICAL SPECIFICATION (TS))</u>
	9.9.4	(WBN TS 5.7.1.2 - Deleted redundant requirements for reviews.)
	9.9.5	WBN TS 5.7.1.3 - Changes were made for consistency with commitment to ANSI N18.7-1976.)
Section 12.2.B (page 64)	Added new last item (page 77)	(WBN TS 5.5.2.3.h. Removed 24 hour notification)
Section 12.2.E.4 (page 64)	Last sentence, added the word "WBN." (page 78)	Editorial change.
Section 12.2.E.4.c (page 64)	Added the word "components." (page 78)	(WBN TS 5.5.2.3.f)
Section 12.2.E.4.e (page 65)	Changed "area of site operation" to "activities and documents." (page 78)	(WBN TS 5.5.2.3.g)
Not applicable	Added new section 12.2.E.5 (page 79)	(WBN TS 5.5.3.b)
Appendix A (page 78)	Added reference to NQA Plan, sections 9.9, 4.1.3.B.5, and 4.1.3.C.7.b (page 92)	Updated matrix to reflect new text in NQA Plan.
Appendix B, Regulatory Guide 1.33 (page 89)	Changed reference from "12.2.E.2" to "12.2.E." (page 103)	Editorial correction.
Appendix B, Regulatory Guide 1.88 (page 96)	Added new section on Appendix A to ANSI N45.2.9 - 1974 (pages 110 and 111)	(WBN TS 5.10.1, 5.10.2, 5.10.3. Did not list records specifically identified in ANSI N45.2.9 - 1974.)

TENNESSEE VALLEY AUTHORITY
NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A), REVISION 6
DESCRIPTION OF CHANGES AND DISPOSITION OF RELOCATED WBN TECHNICAL
SPECIFICATION REQUIREMENTS (REVIEWS, AUDITS, PROCEDURES, RECORD RETENTION)

DISPOSITION OF RELOCATED WBN TECHNICAL SPECIFICATION REQUIREMENTS ADDRESSED IN NQA PLAN PRIOR TO REVISION 6

WBN TS 5.5 - second paragraph, first sentence	Addressed in NQA Plan, Section 4.1.3.C.7.a for audits.
WBN TS 5.5 - second paragraph, fourth sentence	Addressed in NQA Plan, Section 4.1.3.B.5, second paragraph.
WBN TS 5.5.2 - third paragraph	Addressed in NQA Plan, Section 4.1.3.C.7.a for audits.
WBN TS 5.5.2 - fourth paragraph	Addressed in NQA Plan, Section 12.2.C and NQA Plan Appendix B commitment to ANSI N45.2.23 - 1978.
WBN TS 5.5.2.3 - first sentence	Addressed in NQA Plan Section 12.3.B.
WBN TS 5.5.2.3.a	Addressed in NQA Plan, Section 12.2.E.4.a. Deleted words "of unit operation."
WBN TS 5.5.2.3.b	Addressed in NQA Plan, Section 12.2.E.4.b.
WBN TS 5.5.2.3.d	Addressed in NQA Plan, Section 12.2.B.
WBN TS 5.5.2.3.e	Addressed in NQA Plan Sections 12.2.E.4.a and .d and audit modules.
WBN TS 5.5.2.3 - last sentence	Addressed in NQA Plan, Appendix B commitment to ANSI N45.2.12 - 1977.

ENCLOSURE 2

REVISED TVA-NQA-PLN89-A PAGES INCLUDING
RELOCATED TECHNICAL SPECIFICATIONS REQUIREMENTS

REVISION LOG

<u>REVISION NUMBER</u>	<u>EFFECTIVE DATE</u>	<u>DESCRIPTION OF REVISION</u>	<u>PAGES AFFECTED</u>
0	Refer to Appendix A	Initial Issue	All
1	No later than 2/25/91	First annual update	All
2	No later than 4/17/92	Second annual update	All
3	No later than 4/19/93	Third annual update	All
4	No later than 4/19/94	Fourth annual update	All
5	No later than 6/15/95 for BLN, BFN, and SQN. By fuel load for WBN.	Fifth annual update	All
Note: Section 12.2.E.2 is effective after NRC approval.			
6	Upon issuance for BLN, BFN, and SQN. By fuel load for WBN.	Revised to incorporate subject matter relocated from WBN Unit 1 Technical Specifications, Chapter 5.0, <u>Administrative Controls.</u>	4,15,16,17, 22,23,25, 65-71,77,78, 79,92,103,110, 111

TABLE OF CONTENTS
 (Continued)

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
9.2	Quality Assurance Assessments	50
9.3	Control of Special Processes.	51
9.4	Test Control.	53
9.5	Control of M&TE and Installed Safety-Related I&C Devices.	56
9.6	Handling, Storage, and Shipping	60
9.7	Inspection, Test, and Operating Status.	62
9.8	Control of Maintenance.	63
9.9	Plant Reviews	65
10.0	ADVERSE CONDITIONS.	72
11.0	INDOCTRINATION, TRAINING, QUALIFICATION, AND CERTIFICATION	75
12.0	AUDITING.	77
13.0	COMPUTER SOFTWARE AND DATA.	80
14.0	REFERENCES.	81
14.1	Regulations	81
14.2	Regulatory Guidance	83
14.3	TVA Licensing Submittal Documents	83
14.4	QA Manuals.	83
14.5	Other	83
15.0	DEFINITIONS	84

4.1.3.B (continued)

Nuclear Officer, on quality matters. This is to ensure that the quality organization has direct access to appropriate levels of management and sufficient independence and organizational freedom to be able to effectively assure conformance to quality assurance program requirements. The General Manager, NA&L, manages Independent Review and Analysis; Quality Assurance; Licensing and Generation Planning and the Site NA&L Managers. The responsibilities of the General Manager, NA&L, and his direct reports are noted in Section 4.1.3.C.

5. Chairman, Nuclear Safety Review Board

The Nuclear Safety Review Board (NSRB) is an offsite committee which provides senior level oversight of TVA's nuclear program with respect to nuclear safety. The NSRB reviews include the activities of the line organizations, as well as other review, audit, and verification organizations. The NSRB also provides senior level management with an assessment of facility operations and recommendations to improve nuclear safety and plant reliability.

The Chairman, NSRB reports to the Vice President, E&TS, and has an independent reporting relationship to the President, TVA Nuclear and Chief Nuclear Officer and other TVAN management on nuclear safety matters. The Chairman, NSRB, is responsible for advising the President, TVA Nuclear and Chief Nuclear Officer on the adequacy and implementation of TVA's nuclear safety policies and programs and for evaluating these policies and programs for compliance with regulatory requirements governing nuclear safety.

The Chairman, NSRB, is responsible for complying with the requirements of ANSI N18.7-1976/ANS 3.2. The Chairman, NSRB, is also responsible for ensuring that the QA requirements established by this plan related to NSRB functions are either included or referenced (as appropriate) in related procedures or instructions.

The NSRB shall function to provide for independent review as specified in Section 4.1.3.B.5.b and oversight of the audits and technical reviews as specified in Sections 12.2.E and 4.1.3.C.7.b.

4.1.3.B.5 (continued)

The Chairman, members, and alternate members of the NSRB shall be appointed in writing by the President, TVA Nuclear and Chief Nuclear Officer, and shall have an academic degree in engineering or a physical science field, or the equivalent; and in addition, shall have a minimum of five years technical experience in one or more of the areas specified in ANSI N18.7-1976/ANS 3.2. The NSRB shall be composed of at least five members, including the Chairman. Members of the NSRB may be from TVAN, or other TVA organizations or external to TVA. No more than two alternates shall participate as voting members in NSRB activities at any one time.

a. Functions

The NSRB shall, as a minimum, incorporate the following functions:

1. For SQN and BFN, as required by the respective Technical Specifications;
2. Advise the President, TVA Nuclear and Chief Nuclear Officer, on all matters related to nuclear safety;
3. Recommend to the President, TVA Nuclear and Chief Nuclear Officer, any corrective action to improve nuclear safety and plant operations; and
4. Notify the President, TVA Nuclear and Chief Nuclear Officer, of any safety significant disagreement between the NSRB and the organization or function being reviewed.

b. NSRB Review Responsibilities

Reviews for BFN and SQN shall be in accordance with their respective Technical Specifications. The NSRB for WBN shall be responsible for the review of:

1. The 10 CFR 50.59 Safety Evaluation Program. Safety evaluations will be screened. Review of representative safety evaluations will be performed, selected based on safety significance, for 1) changes to procedures,

4.1.3.B.5.b.1 (continued)

- equipment or systems and 2) tests or experiments completed under the provision of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question;
2. Proposed changes to procedures, equipment, or systems that involve an unreviewed safety question as defined in 10 CFR 50.59;
 3. Proposed tests or experiments that involve an unreviewed safety question as defined in 10 CFR 50.59;
 4. Proposed changes to Technical Specifications or the Operating License;
 5. Violations of codes, regulations, orders, license requirements, and internal procedures or instructions having nuclear safety significance;
 6. Reportable events (10 CFR 50.73);
 7. Plant staff performance;
 8. Recognized indications of unanticipated deficiencies in any aspect of design or operation of structures, system, or components that could affect nuclear safety;
 9. Significant accidental, unplanned, or uncontrolled radioactive releases, including corrective action to prevent recurrence;
 10. Significant operating abnormalities or deviations from normal and expected performance of equipment that affect nuclear safety; and
 11. Implementation of the corrective action program.
- c. Minutes of each NSRB meeting and reports of other reviews shall be forwarded to the President, TVA Nuclear and Chief Nuclear Officer, within 14 days for BFN and SQN and 30 days for WBN following completion of the meeting or review.

4.1.3.C.7.b (continued)

12. Planning, conducting, and reporting the results of Site assessments, and following up identified adverse conditions to ensure appropriate corrective action has been taken.
13. Ensuring assessments of Site engineering, construction, and operations activities are performed to determine compliance with QA program requirements.
14. Performing assessments of onsite contractors, including onsite major engineering contractors who perform engineering services.
15. Establishing and maintaining a Site Licensing Program and performing Independent Review and Analysis activities.
16. Reviewing the ASME III QAM (WBN and BLN).
17. Performing onsite independent technical reviews.

NA&L (through the site Manager, Independent Review and Analysis) is responsible for independent technical review. These responsibilities shall encompass:

- a. Plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety;
- b. Plant operations, modifications, maintenance, and surveillance to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical;
- c. Internal and external operational experience information that may indicate areas for improving plant safety;
- d. Making detailed recommendations to the Site Vice President for revising procedures, equipment modifications, or other means of improving nuclear safety and plant reliability; and
- e. Preparing and maintaining records of independent technical review activities.

4.1.3.C.7.b (continued)

NA&L technical review personnel shall have a bachelor's degree in engineering or equivalent and two to four years experience in their field, including one or two years nuclear experience.

The Site NA&L Managers are required to have a bachelor's degree in an engineering or scientific discipline, or equivalent related experience. They shall have at least nine years experience in plant design, construction, power plant operation or maintenance, including five years experience in QA-related activities. They are required to have at least one year of experience in the QA organization of a nuclear power plant at the time of initial core loading or assignment to the active position.

The NA&L organizations are shown in Appendix H.

c. Independent Review and Analysis Manager (corporate)

The Independent Review and Analysis Manager is responsible to:

1. Manage the Independent Safety Engineering function (independent technical reviews) and the Nuclear Experience Review Program.
2. Manage a program for tracking and trending adverse conditions.
3. Provide Nuclear Safety Review Board support.

d. Licensing and Generation Planning Manager (corporate)

The Licensing and Generation Planning Manager is responsible for maintaining an interface between TVA and NRC for licensing activities.

4.1.4 New Plant Completion

In addition to the responsibilities described in subsection 4.1.2, the Vice President, New Plant Completion, is responsible for the following:

4.1.6.A (continued)

- c. Control of M&TE and installed safety-related I&C devices.
 - d. Handling, storage, and shipping.
 - e. Inspection, test, and operating status.
 - f. Control of maintenance.
 - g. Indoctrination, training, qualification, and certification.
- B. Implementing programs at licensed units, ensuring that the QA requirements of this plan are appropriately established in licensed units Site procedures.
- C. The plant technical review process and PORC.

5.0 NUCLEAR QA PROGRAM

The General Manager, NA&L, develops this plan to establish the requirements of the NQAP that encompass the General Management and General Regulatory Requirements in Sections 3.1 and 3.2 of this plan. The program requirements apply to design, construction, testing, operation, maintenance, repair, replacement, and modification of TVA nuclear facilities. Units in transition to the operational phase require special processing. The Vice President, New Plant Completion, shall provide notification to the Senior Vice President, Nuclear Operations (NO), and the Vice President, E&TS, of those activities affecting the unit that have been transitioned to Operations.

TVAN organizations performing activities within the scope of the NQAP shall implement the program through written procedures and instructions.

Non-TVAN organizations providing services within the scope of the NQAP shall develop QA programs as required by Intergroup Agreements. Non-TVAN organization QA programs shall be reviewed and/or audited by NA&L.

5.1 Program Scope

- A. The requirements of the NQAP shall apply to safety-related structures, systems, and components and associated activities and shall take into account special equipment, environmental conditions, skills, or processes.

9.8.2 (continued)

E. Trending

The Maintenance Program shall establish the parameters for trending maintenance activities and describe the methods for evaluating and documenting adverse trends.

9.8.3 Responsibilities

- A. The Senior Vice President, NO is responsible for the development of the nuclear maintenance program. The program elements in Section 9.8.2 and the related source requirements contained within the documents listed in Section 9.8.4 shall be addressed.
- B. The Vice President, New Plant Completion is responsible for the implementation of the nuclear maintenance program during construction phase activities.
- C. The Senior Vice President, NO is responsible for the implementation of the nuclear maintenance program during operations phase activities.

9.8.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this plan. These establish mandatory controls which must be addressed in the development of programs and procedures for the Nuclear Maintenance Program.

9.9 Plant Reviews

9.9.1 General

The plant staff organization provides reviews of day-to-day activities to ensure they are conducted in a safe manner. The PORC is a multidisciplined committee responsible for providing an oversight review of documents required for the safe operation of the plant. PORC advises the Plant Manager on all matters related to nuclear safety. Technical Reviewers provide for reviews of procedures, procedure changes, and proposed changes to structures, systems, and components that affect nuclear safety in their area of expertise.

Plant reviews for BFN and SQN are as described in the respective plant technical specifications. For WBN only, plant reviews are as described in Sections 9.9.2 through 9.9.5.

9.9.2 Plant Reviews

The items in Section 9.9.2.B.7 receive varying degrees of review before final approval or use as specified in approved administrative procedures. The degree of review shall be commensurate with the potential to affect nuclear safety. As a minimum each item shall be reviewed by at least one individual knowledgeable in the subject matter and cross-disciplinary review(s) shall be obtained as needed, before approval.

The staff shall provide technical and cross-disciplinary reviews. These reviews shall be governed by administrative procedures for items considered under Section 9.9.2.B.7. The sponsor of each item shall be responsible for the conduct of all reviews.

A. Plant Technical Review Process

Technical Reviewers shall be qualified to perform technical reviews based on the individual's training, experience, and knowledge level. Technical Reviewers assigned the responsibility for reviewing for 10 CFR 50.59 requirements shall receive training in this process. Technical Reviewers shall not review their own work. The minimum qualification requirements shall be as recommended in Sections 4.2, 4.3.1, 4.4, or 4.6.1 of ANSI N18.1-1971.

1. Organization

Each supervisor is responsible for ensuring that technical reviewers are available for reviews for the equipment, systems, programs, procedures and other areas under their supervision, and that reviews are performed to detect safety questions.

2. Reporting

Technical Reviewers report to their supervisor and/or PORC on all activities and findings. The signed document processing form(s) shall serve as the reviewer's approval recommendation to the designated Approval Authority.

3. Functions

The Technical Reviewer(s) shall:

- a. Advise his supervisor and/or PORC on all matters related to nuclear safety;

9.9.2.A.3 (continued)

- b. Determine the need for additional reviews by other disciplines and ensure that identified reviews are conducted for items considered under Section 9.9.2.A.4 prior to their implementation, except as provided in Section 9.9.5;
- c. Recommend to the designated Approval Authority, approval or disapproval of items considered under Section 9.9.2.A.4 prior to their implementation, except as provided in Section 9.9.5;
- d. Determine whether each item considered under Section 9.9.2.A.4.a through .c constitutes an unreviewed safety question as defined in 10 CFR 50.59; and
- e. Notify the PORC of any safety significant disagreement between reviewing organizations.

4. Responsibilities

The Technical Reviewers shall be responsible for the technical review of:

- a. Proposed programs and procedures required by Section 9.9.2.B.7.a and changes thereto;
- b. Proposed changes and modifications to unit systems or equipment that affect nuclear safety;
- c. Proposed tests and experiments that affect nuclear safety; and
- d. Proposed changes to Technical Specifications (TS), their Bases, and the Operating License.

B. Plant Operations Review Committee (PORC)

The PORC shall be the onsite review committee. The committee shall function as a multi-disciplinary review body for items which affect plant nuclear safety. PORC shall be organized and shall conduct business as described below:

9.9.2.B (continued)

1. Composition

Chairman: Operations Manager
Member:* Maintenance/Modifications Manager
Member:* Technical Support Manager
Member: Nuclear Assurance and Licensing
Representative (non-voting member)
Member: Site Engineering Representative
Member:* Radiological Control Manager
Member: Chemistry Manager
*May serve as alternate PORC Chairman

2. Alternates

All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

3. Meeting Frequency

The PORC shall meet on an as needed basis as convened by the PORC Chairman or his designated alternate.

4. Quorum

The PORC quorum shall consist of the Chairman or his designated alternate and four members of which two may be alternates.

5. Reporting

The PORC reports to the Plant Manager on all activities and findings. The meeting minutes shall serve as the official correspondence from PORC to the Plant Manager. PORC recommendations shall be recorded in the minutes and submitted to the Plant Manager and NSRB by the PORC Chairman.

9.9.2.B (continued)

6. Functions

PORC shall, as a minimum, incorporate functions that:

- a. Advise the Plant Manager on all matters related to nuclear safety;
- b. Recommend to the Plant Manager, or his designee, approval or disapproval of procedures that delegate review responsibilities of items considered under Sections 9.9.2.B.7 and 9.9.5;
- c. Recommend to the Plant Manager, or his designee, approval or disapproval of items considered under Section 9.9.2.B.7 prior to their implementation, except as provided in Section 9.9.5;
- d. Provide for an oversight review of selected safety evaluations as defined in 10 CFR 50.59, or items considered under Section 9.9.2.B.7.a through .c.
- e. Review of each item considered under Section 9.9.2.B.7.a through .c which involves an unreviewed safety question as defined in 10 CFR 50.59; and
- f. Notify the Site Vice President and the NSRB of any safety significant disagreement between the PORC and the Plant Manager. However, the Plant Manager shall have responsibility for resolution of such disagreements.

7. Responsibilities

The PORC shall be responsible for the review of:

- a. Administrative procedures, program descriptions, and changes thereto for the following:
 - (1) The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.
 - (2) The emergency operating procedures necessary to implement NUREG-0737 and NUREG-0737, Supplement 1 (Generic Letter 82-33).

9.9.2.B.7.a (continued)

- (3) Security Program.
 - (4) Fire Protection Program Implementation.
 - (5) Radiation Protection Program.
 - (6) Process Control Program (PCP)
 - (7) Offsite Dose Calculation Manual (ODCM).
 - (8) Primary Coolant Sources Outside Containment.
 - (9) In-Plant Radiation Monitoring.
 - (10) Post-Accident Sampling.
 - (11) Component Cyclic or Transient Limit.
 - (12) Reactor Coolant Pump Flywheel Inspection Program.
 - (13) Inservice Testing Program.
 - (14) Steam Generator Tube Surveillance Program.
 - (15) Secondary Water Chemistry Program.
 - (16) Ventilation Filter Testing Program
 - (17) Explosive Gas and Storage Tank Radioactivity Monitoring Program.
 - (18) Diesel Fuel Oil Testing Program.
 - (19) Safety Function Determination Program (SFDP).
 - (20) Site Radiological Emergency Plan.
 - (21) Radwaste Treatment System.
 - (22) Inservice Inspection Program.
- b. Proposed changes and modifications to unit systems or equipment that affect nuclear safety.

9.9.2.B.7 (continued)

- c. Proposed tests and experiments that affect nuclear safety.
- d. Proposed changes to Technical Specifications, their Bases, and the Operating License.

9.9.3 Records

Written records of reviews shall be maintained. As a minimum these records shall include:

- A. Results of the activities conducted under the provisions of Section 9.9.
- B. Recommended approval or disapproval of items considered under Sections 9.9.2.B.7 and 9.9.2.A.4;
- C. Determination whether each item considered under Sections 9.9.2.B.7.a through .c and Sections 9.9.2.A.4.a through .c constitutes an unreviewed safety question as defined in 10 CFR 50.59.

9.9.4 Procedure Approval

Each procedure of Section 9.9.2.B.7.a shall be approved by the Plant Manager or his designee in accordance with approved administrative procedures prior to implementation except as specified in Section 9.9.5 and reviewed periodically as set forth in administrative procedures.

9.9.5 Temporarily Approved Changes

Temporarily approved changes to procedures of Section 9.9.2.B.7.a shall be made in accordance with ANSI N18.7-1976/ANS 3.2 as modified in Appendix B of this Plan. Such changes shall be documented and reviewed in accordance with Section 9.9.2 and approved by the Plant Manager or his designee in accordance with approved administrative procedures within 14 days of implementation.

11.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this plan. These establish mandatory controls which must be addressed in the development of programs and procedures for the indoctrination, training, qualification, and certification program.

12.0 AUDITING

12.1 General

Measures shall be established to implement a comprehensive audit program which consists of internal audits, including TVAN and other TVA organizations, which support the nuclear program and contractor/supplier audits to determine and assess the adequacy and effectiveness of the QA program.

12.2 Program Elements

- A. An audit plan shall be prepared identifying the audits to be performed and their frequencies and schedule.
- B. Audits shall include: a determination of the effectiveness of QA program elements; evaluation of work areas, activities, processes, and items; review of documents and records; review of audit results with responsible management; follow-up on corrective action taken for deviations identified during the audit; and escalation to appropriate senior management of any safety significant disagreement between the auditing organization and the organization or function being audited.
- C. Audits shall be performed in accordance with written procedures or checklists by qualified, certified, and appropriately trained personnel not having direct responsibilities in the areas being audited.
- D. Audited organizations shall provide access to facilities, documents, and personnel needed to perform the audits. They shall take necessary action to correct deviations identified by the audit in a timely manner.
- E. Internal Audits
 1. The scope of an audit shall be determined by considering such factors as work areas, activities, processes, or items and the specific organizations involved.

12.2.E (continued)

2. For BFN and SQN, auditing organizations shall ensure that audit procedures and instructions adequately cover applicable elements of the NQAP. Audit subjects are specified in plant technical specifications and regulatory commitments. Audit frequencies shall be biennially with the exception of fire protection related audits which shall be in accordance with the plant technical specifications. The audit frequencies for programs involving each site Radiological Emergency Plan and Physical Security/Contingency Plan are as required by the Code of Federal Regulations.
3. Audits of Design and Construction Phase units and the Fitness for Duty Program are in accordance with the Code of Federal Regulations.
4. Audits of WBN unit activities shall be performed with oversight by the NSRB. Except as noted in f, g, and h below, audit frequencies shall be in accordance with E.2 above. These WBN audits shall encompass:
 - a. The conformance to provisions contained within the Technical Specifications and applicable license conditions.
 - b. The performance, training and qualifications of the plant staff.
 - c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems, components, or method of operation that affect nuclear safety.
 - d. The performance of activities required by the Nuclear Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50.
 - e. Any other activities and documents considered appropriate by the NSRB or the President, TVA Nuclear and Chief Nuclear Officer.
 - f. The fire protection programmatic controls including the implementing procedures at least once per 24 months.
 - g. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite license personnel or an outside fire protection firm.

12.2.E.4 (continued)

- h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than three years.
 - i. The Radiological Environmental Monitoring program and the results thereof.
 - j. The performance of activities required by the Nuclear Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975.
 - k. The Offsite Dose Calculation Manual and implementing procedures.
 - l. The Process Control Program and implementing procedures for solidification of wet radioactive wastes.
 - m. The site Radiological Emergency Plan and implementing procedures.
 - n. The site Physical Security/Contingency Plan and implementing procedures.
5. Audit reports, including recommendations to the management of the organization being audited, shall be maintained.
- F. Contractor/Supplier Audits
- 1. Audits of selected suppliers shall be conducted to verify implementation and adequacy of specified QA requirements.
 - 2. Contractors/suppliers to be audited shall be selected on the basis of the importance of their products or services to safety, status of contract activity, historical performance of the supplier, and potential QA problems that may be discovered during source surveillance inspection activities or earlier audits.

APPENDIX A

COMPARISON MATRIX OF QUALITY ASSURANCE PLAN REQUIREMENTS
 WITH THOSE OF
 10 CFR 50, APPENDIX B, AND SELECTED ANSI STANDARDS

<u>10 CFR 50, Appx B</u>		<u>ANSI N45.2 - 1971</u>		<u>ANSI N18.7 - 1976</u>	
Criterion	NQA Plan	Section	NQA Plan	Section	NQA Plan
I	4.0;4.1	2.0	5.0	3.1	4.1;5.0
II	5.0	3.0	4.0;4.1	3.2	4.0;4.1
III	7.0	4.0	7.0	3.3	11.0
IV	8.1	5.0	8.1	3.4	4.0;11.0
V	6.0;7.0;9.9	6.0	6.0;7.0;9.9	4.0	4.1.3.B.5;5.3;6.0
VI	6.0;7.0;9.9	7.0	6.0;7.0;9.9		4.1.3.C.7.b;9.9; 12.0
VII	8.2	8.0	8.2	5.1	5.0
VIII	8.3	9.0	8.3	5.2.1	4.0
IX	9.3	10.0	9.3	5.2.2	6.0
X	9.1	11.0	9.1	5.2.3	6.0
XI	9.4	12.0	9.4	5.2.4	6.0
XII	9.5	13.0	9.5	5.2.5	6.0
XIII	9.6	14.0	9.6	5.2.6	6.0;9.7
XIV	9.7	15.0	9.7	5.2.7	6.0;9.8
XV	10.0	16.0	10.0	5.2.8	6.0;9.1;9.4
XVI	10.0	17.0	10.0	5.2.9	5.1;6.0
XVII	6.3	18.0	6.3	5.2.10	4.1.2;6.0
XVIII	12.0	19.0	12.0	5.2.11	6.0;10.0
				5.2.12	6.0;6.3
				5.2.13	6.0;8.0;9.6
				5.2.14	6.0;10.0
				5.2.15	6.0
				5.2.16	6.0;9.5
				5.2.17	6.0;9.1
				5.2.18	6.0;9.3
				5.2.19	6.0;9.4
				5.3	6.0
				5.3.1	6.0
				5.3.2	6.0
				5.3.3	6.0
				5.3.4	6.0
				5.3.5	6.0;9.8
				5.3.6	6.0;5.1
				5.3.7	6.0;9.5
				5.3.8	6.0;5.1
				5.3.9	6.0;5.1
				5.3.10	6.0;9.1;9.4

APPENDIX B

Page 11 of 21

Table 2

REGULATORY GUIDE CONFORMANCE STATUS

- a. Temporary changes which clearly do not change the intent of the approved procedure shall as a minimum be approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator License on the unit affected or as defined in Technical Specifications, FSAR, or appropriate plant procedures.
 - b. For facilities holding a construction permit where system(s) and/or components have been released to the operations organization, temporary changes to procedures, as described above, shall as a minimum be approved by two members of the plant management staff, at least one of whom shall be a designated member of the plant operations management staff.
3. Section 5.2.13.1 - The statement that changes made to procurement documents be subject to the same degree of control as was used in the preparation of the original documents is applied consistent with the requirements of ANSI N45.2.11, paragraph 7.2. Minor changes to documents, such as inconsequential editorial corrections or changes to commercial terms and conditions, may not require that the revised document receive the same review and approval as the original documents.
 4. Section 5.2.15 - The guidelines of this section are accepted with the following alternatives:
 - a. Minor changes to documents are processed as delineated in Section 6.1.2.F3 of this plan.
 - b. TVA has programmatic controls in place that make a biennial review process unnecessarily duplicative. These programmatic controls ensure procedures are periodically reviewed and maintained current when pertinent source material is revised; the plant design changes; and/or any deficiencies occur. TVA has determined that this approach better addresses the purpose of the biennial review process and that, from a technical and practical standpoint, is better suited to ensure the validity of operational phase site procedures and instructions.
 5. Section 5.2.17 - The statement that deviations, their cause, and any corrective action completed or planned shall be documented will apply to significant deviations. Other identified deviations will be documented and corrected. This interpretation is consistent with Appendix B to 10 CFR 50, Criterion XVI, "Corrective Action."
 6. TVA will comply with regulatory position C.4 except that audit frequencies are specified in NQA Plan Section 12.2.E.

NRC Regulatory Guide 1.37 - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants," 3/73, endorses ANSI N45.2.1-1973.

APPENDIX B
Page 18 of 21

Table 2

REGULATORY GUIDE CONFORMANCE STATUS

3. Are within a facility with a fuel loading less than 25 pounds/square foot as defined by NFPA 232-1980.

For storage of film and other processed records, humidity and temperature controls shall be provided to maintain a stable environment. Recommendations by the manufacturer will be considered in determining an acceptable range of tolerance.

In addition to the records specified in Appendix A to ANSI N45.2.9-1974, the following records and retention times are applicable to WBN:

1. Licensee Event Reports required by 10 CFR 50.73 (3 years).
2. Records of changes made to the procedures required by NQA Plan Section 9.9.2.B.7.a (3 years).
3. Records of surveillance activities, inspections, and calibrations required by the Technical Specifications and the Fire Protection Program (5 years).
4. Records of sealed source and fission detector leak tests and results (5 years).
5. Records of annual physical inventory of all sealed source material of record (5 years).
6. Records of reactor tests and experiments (lifetime).
7. Records of inservice inspections performed pursuant to the Technical Specifications (lifetime).
8. Records of quality assurance activities required by the NQA Plan not listed in items 1 through 5 above and which are classified as permanent records by applicable regulations, codes, and standards (lifetime).
9. Records of reviews performed for changes made to procedures, equipment, or reviews of tests and experiments pursuant to 10 CFR 50.59 (lifetime).
10. Records of the reviews and audits required by NQA Plan Sections 9.9.2, 4.1.3.B.5, and 12.2.E.5 (lifetime).
11. Records of the service lives of all hydraulic and mechanical snubbers required by Technical Requirement (TR) 3.7.3, "Snubbers," including the date at which the service life commences, and associated installation and maintenance records (lifetime).
12. Records of secondary water sampling and water quality (lifetime).

APPENDIX B
Page 19 of 21

Table 2

REGULATORY GUIDE CONFORMANCE STATUS

13. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date (these records should include procedures effective at specified times and QA records showing that these procedures were followed (lifetime).
14. Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program (lifetime).
15. Records of steam generator tube surveillance (lifetime).

NRC Regulatory Guide 1.94 - "Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants," Revision 1, 4/76, endorses ANSI N45.2.5-1974.

The NQAP follows this Guide with the following alternatives:

1. The qualification requirements for quality control (QC) inspectors are stated in our position on Regulatory Guide 1.58 in this table.
2. Testing frequency and QC acceptance criteria for concrete construction is described in the Safety Analysis Report for each plant.
3. Burning of bolt holes is acceptable when specifically approved by engineering.
4. The installation method for high strength bolting may be either the automatic cutoff impact wrench method, turn-of-nut method, or direct tension indicator method.
5. Torque wrench inspection of completed connections installed by the turn-of-nut method shall not be required but may serve to resolve disagreements concerning the results of inspection of bolt tension.
6. Torque wrench inspection of the load indicator washer type of direct tension indicator shall not be required.
7. Bolts shall be considered long enough if the bolt point is flush with or outside the face of the nut.
8. When specified by the design output document, TVA's alternative for visual welding acceptance criteria will be NCIG-01, May 7, 1985, Revision 2, "Visual Weld Acceptance Criteria for Structural Welding of Nuclear Power Plants."
9. For modifications or repairs to structures within the scope of N45.2.5-1974, plant management shall refer to the Site Engineering organization for any design analyses.

ENCLOSURE 3

REVISED FSAR PAGES

TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Page</u>
	13.0 <u>CONDUCT OF OPERATIONS</u>	13.1-1
13.1	<u>ORGANIZATIONAL STRUCTURE OF APPLICANT</u>	13.1-1
13.1.1	Corporate Organization	13.1-1
13.1.1.1	Design Responsibilities	13.1-1
13.1.2	Nuclear Power	13.1-1
13.1.2.1	Offsite Organizations	13.1-1
13.1.2.2	Onsite Organization	13.1-2
13.1.3	Qualification Requirements for Nuclear Facility Personnel	13.1-2
13.2	<u>TRAINING PROGRAMS</u>	13.2-1
13.2.1	Accredited Training Programs	13.2-1
13.2.2	General Employee and Fitness for Duty Training Programs	13.2-3
13.2.3	Other Training Programs	13.2-1
13.3	<u>EMERGENCY PLANNING</u>	13.3-1
13.4	<u>REVIEW AND AUDIT</u>	13.4-1
13.4.1	Onsite Review	13.4-1
13.4.2	Independent Review and Audit	13.4-1
13.5	<u>SITE PROCEDURES</u>	13.5-1
13.5.1	System of Site Procedures	13.5-1
13.5.1.1	Conformance With Regulatory Guide 1.33	13.5-1
13.5.1.2	Preparation of Procedures	13.5-1
13.5.1.3	Administrative Procedures	13.5-2
13.5.2	Operating and Maintenance Procedures	13.5-2
13.5.2.1	Operating Procedures	13.5-2
13.5.2.1.1	General Operating Instructions	13.5-2
13.5.2.1.2	System Operating Instructions	13.5-2
13.5.2.1.3	Abnormal Operating Instructions	13.5-3
13.5.2.1.4	Emergency Instructions	13.5-3
13.5.2.1.5	Alarm Response Instructions	13.5-3
13.5.2.1.6	Fuel Handling Instructions	13.5-3
13.5.2.2	Other Procedures	13.5-3
13.5.2.2.1	Maintenance Instructions and Modification Procedures	13.5-3
13.5.2.2.2	Instrument Maintenance Instructions	13.5-3
13.5.2.2.3	Surveillance Instructions and Technical Requirements Instructions	13.5-4
13.5.2.2.4	Technical Instructions	13.5-4
13.5.2.2.5	Miscellaneous Procedures	13.5-4
13.5.2.2.6	Power Escalation Tests	13.5-4

TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Page</u>
13.6	<u>PLANT RECORDS</u>	13.6-1
13.6.1	Plant History	13.6-1
13.6.2	Operating Records	13.6-1
13.6.3	Event Records	13.6-2
13.7	<u>NUCLEAR SECURITY</u>	13.7-1
13.7.1	Personnel and Program Evaluations	13.7-1

13.4 REVIEW AND AUDIT

13.4.1 Onsite Review

The plant staff organization provides continuing review of operational activities to ensure they are conducted in a safe manner. The Plant Operations Review Committee (PORC) is a multi-disciplined committee responsible for providing an oversight review of programs, documents, and activities required for the safe operation of the plant. The PORC advises the Plant Manager on matters related to nuclear safety. Also, technical reviewers provide for reviews of procedure changes and proposed changes to structures, systems, and components that affect nuclear safety in their area of expertise. These technical reviews determine the need for a cross-disciplinary review and whether or not an unreviewed safety question is involved.

Technical reviewers and PORC shall be qualified, organized, and conduct business as described in Reference [1].

13.4.2 Independent Review and Audit

Independent review and evaluation is performed by the Nuclear Safety Review Board (NSRB). The NSRB is described in Reference [1].

The Nuclear Assurance and Licensing (NA&L) organization conducts the audit and assessment program and performs independent technical reviews as described in Reference [1].

REFERENCES

1. Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A.

THIS PAGE INTENTIONALLY LEFT BLANK

13.6 PLANT RECORDS

13.6.1 Plant History

TVA's records program observes all acts of Congress, executive orders and regulations of Federal agencies having jurisdiction in records administration (for the particular case of nuclear plants, this includes 10 CFR 50, Appendix B, Criterion XVII). TVA complies with Department of Energy regulations concerning the preservation and disposal of records of public utilities and licensees, insofar as those regulations apply to TVA records relating to the generating, transmission, and sale of electric energy.

The site Document Control Records Management (DCRM) Manager has responsibility for 1) developing, implementing, and maintaining an integrated site DCRM program to ensure that documents such as procedures, vendor manuals, and drawings are properly processed, up-to-date, and readily available for use, and 2) managing a program for storing, updating, and retrieving plant documents.

13.6.2 Operating Records

Records reflecting plant or equipment performance and records of tests and inspections which support compliance with the plant licenses, including records of radioactivity release to the environs are routed to the site document control section for retention. These records are originated by all plant sections.

The unit Senior Reactor Operator (SRO) maintains a narrative log book which is a chronological record of significant plant events and conditions. The unit operators maintain similar journals containing details pertaining to the operation of their individual units. The plant operators also maintain operating data sheets which ensure their frequent observations of equipment condition and operating values. These records are examined by the plant operations supervisor and are support documents for performance analysis. The unit operator and SRO journals are retained by the site DCRM.

The station computer printouts and the operators data sheets serve as the normal source of operating data and statistics. To ensure continuity of information, provision is made for supplementary data sheets to be maintained if the computer becomes inoperative. In addition, this information is supported by installed recording and data logging instrumentation. These records are sent to the Site DCRM on a regular basis for retention.

The Maintenance and Engineering sections initiate equipment history and inventory. These history files are maintained and updated by Site DCRM. These records contain complete information on all repairs, modifications, tests, and other data as considered necessary to provide a comprehensive material history of the item considered.

Specific records and their retention periods are specified in the Reference [1].

LICENSING TRANSMITTAL TO NRC
SUMMARY AND CONCURRENCE SHEET

THE PURPOSE OF THIS CONCURRENCE SHEET IS TO ASSURE THE ACCURACY AND COMPLETENESS OF TVA SUBMITTALS TO THE NRC.

DATE 08/27/95 COMMITMENT DATE Prior to Fuel Load

SUBMITTAL PREPARED BY Chris Morgan ACTION NO. _____
C. E. Morgan

FEES REQUIRED YES _____ NO X

PROJECT/DOCUMENT I.D. -- August 11, 1995, REQUEST FOR ADDITIONAL INFORMATION (RAI) - WATTS BAR UNIT 1 TECHNICAL SPECIFICATIONS (TS), RELOCATION OF QUALITY ASSURANCE REQUIREMENTS (TAC NO. M76742)

PURPOSE/SUMMARY -- Provide responses to RAI.

RESPONDS TO _____ (RIMS NO.) COMPLETE RESPONSE YES X NO _____

PROBLEM OR DEFICIENCY DESCRIPTION -- The NRC has reviewed the relocation of administrative control requirements from the Technical Specifications to other licensing controlled documents and does not agree that the proposed location of the relocated requirements would ensure that changes be made under 10 CFR 50.54(a).

CORRECTIVE ACTION/COMMITMENT -- TVA will revise TVA-NQA-PLN89-A as necessary to cover the content of the material previously contained in the proposed Watts Bar Technical Specifications.

INDEPENDENT REVIEW (IF REQUIRED) N/A DATE _____

WATTS BAR LICENSING INTERNAL CONCURRENCE

*copy
9/1/95*

FOLIO: 9/1/95 COVER LETTER ENCLOSURE(S) ATTACHMENT(S)
J. Vorees J. E. Sanders

A concurrence signature reflects that the signatory has assured that the submittal is appropriate and consistent with TVA Policy, applicable commitments are approved for implementation, and supporting documentation for submittal completeness and accuracy has been prepared.

NRA review required (affects policy, violations, backfit challenges, changes to licensing basis commitments, license amendments, technical specification changes, or other significant issues). YES _____ NO X

CONCURRENCE

NAME ORGANIZATION SIGNATURE DATE

D. V. Kehoe NA&L Mgr DVK 9-1-95

APPROVED [Signature] DATE 9/1/95
WBN Site Licensing Manager

APPROVED _____ DATE _____
J. A. Scalice, Site Vice President

*OK per discussion between Bruce Schofield and John Scalice 8-31-95
Len 9-1-95*