



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

FEB 09 1998

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

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket No. 50-390

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - COMMITMENT SUMMARY REPORT

The purpose of this letter is to provide the WBN Commitment Summary Report for the period of February 29, 1996 through February 9, 1998, as required by the NRC endorsed Nuclear Energy Institute's (NEI) "Guideline For Managing NRC Commitments." This report summarizes docketed commitments that TVA has evaluated and revised using administrative controls that incorporate the guidelines.

If you should have any questions, please contact me at (423) 365-1824.

Sincerely,

P. L. Pace
Site Licensing Manager

Enclosure
cc: See page 2

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COMMITMENT SUMMARY REPORT

| Commitment Evaluation #/ Commitment Tracking # | Source Document | Summary of Original Commitment | Summary of Commitment Changes | Basis/Justification For Changes |
|---|------------------------|--|--------------------------------------|---|
| 96-001 NCO910013008 | NOV 390/90-15-02 | Random radiography of full penetration welds will be performed quarterly. | Decommit | Not a Code requirement. TVA will comply with ASME requirements for welding activities. |
| 96-002 NCO890088001 | Letter dated 4/25/89 | Perform welding activities to Code of Record (ASME III) | Decommit | Welding activities are performed to ASME XI. |
| 96-003 L44901024806 | Letter dated 10/24/90 | Control welding by ASME III and transition to Section XI for operational phase. | Decommit | Construction activities complete. Welding activities are performed to ASME XI. |
| 96-004 NCO880283078 | Letter dated 5/8/95 | Perform testing to determine if a synergism exists between physical stress and aging for low voltage power cables. | Decommit | Walkdowns and inspections as a result of the Cables Issues CAP confirmed that low voltage power cables were trained at or above the ICEA limit. This finding obviates the need for further research in this area. |
| 96-005 NCO880178042 | NOV 391/87-19-02 | Revise QMI 802.7 to require quarterly housekeeping surveillances by QA. | Decommit | Assessments of housekeeping are performed as directed by management |
| 96-006 NCO870195011 | NOV 391/87-03-03 | Perform assessments to the Unit 2 PM program to ensure cleanness. | Decommit | This program is assessed as determined by management. |
| 96-007 NCO920042726 | Letter dated 4/10/89 | Audit modules 3.0 and 8.0 will be revised to emphasize reviewing radiography activities. | Decommit | Radiography reviews during construction of WBN was appropriate due to the size of the activity and prior problems. Based on audits and inspection results indicate significant improvement in this area. Reviews of radiography activities will be performed based on management direction. |
| 96-008 390/84-33-01 | NOV 390/84-33-01 | QA will assess completed NRC 398 forms. | Decommit | This activity is evaluated during audits/assessments as directed by management. |

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| 96-010 NCO840027001 | NOV 390/83-51-01 and 391/83-40-01 | QA perform periodic survey of test data packages (Preop) | Decommit | The Startup and Test program was concluded. |
| 96-012 NCO880178043 NCO880178044 | NOV 391/87-19-01 | Revise QMI to delineate housekeeping by observations through an attribute list. Deficiencies will be trended. | Decommit | Housekeeping inspections are performed as part of routine Inspector of the day activities and the results are trended in a quarterly trend report. |
| 96-013 390/91-18-05 | NOV 390/91-18-05 | As part of the corrective actions taken for this NOV, QA began periodic monitoring of drawing control files. | Decommit | This program is evaluated during audits/assessments as directed by management. |
| 96-015 NCO920048084 | NOV 390/86-20-01 | NOV related to failure to change test procedures that were PORC approved. Ensure procedures meet NQAP, FSAR, etc. requirements | Decommit | The pre-op test program was superseded by the Startup test program which has concluded. |
| 96-016 NCO920053057 | Generic Ltr 83-28 | QE section routinely and independently verifies that the plant instructions utilize the CSSC list. | Decommit | Work documents are evaluated during assessments and audits of Maintenance/Modifications organizations. |
| 96-017 NCO890012027 | Letter dated 1/13/89 | All quality functions including inspections, examinations, surveillances and assurance activities are now the responsibility of QA | Decommit | The Nuclear Quality Assurance Plan (NQAP) defines Quality responsibilities. This document is controlled through the 50.54(a) process. |
| 96-018 NCO920042205 | Letter dated 10/5/84 | QA surveillance of the independent verification program will be a continuing part of the WBN QA program. | Decommit | This item is evaluated during audits/assessments as directed by management. |
| 96-019 NCO860124054 | Letter dated 2/21/89 Welding Project | Perform general surveillance of welding activities. | Decommit | The surveillance attributes are verified during each weld inspection. NQAP defines the program for establishing holdpoints. |
| 96-023 NCO920048189 | NOV 390/83-49-07 | Audit procedure revised to require listing of all individuals contacted during audits. | Decommit | The NQAP defines the audit process. |

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| 96-024 NCO920048326 | NOV 390/80-23-03 | QAP-18.1 requires that category B audit findings be corrected. | Decommit | This requirement is covered by the NQAP. Corporate Audit Manager is responsible for performing audits at WBN. |
| 96-025 NCO890012032 | Letter dated 1/13/89 | A program for performance based audits was implemented. | Decommit | The NQAP defines the implementation of performance based audits per Regulatory Guide 1.144. |
| 96-026 NCO920048008 | NOV 390/82-09-01 | All auditors are trained and qualified in accordance with Regulatory Guide 1.146 and ANSI N 45.2.23. | Decommit | The NQAP defines the requirements for qualification of auditors to the Regulatory Guide and ANSI N 45.2.23. |
| 96-027 NCO920048012 | NOV 390/80-19-01 | Employees have been instructed to know the information in the procedures (NDE) or have the procedure present when performing inspection. | Decommit | The NQAP defines the program for performing activities in accordance with approved and controlled procedures, instructions and drawings. |
| 96-029 NCO890012028 NCO920048117 | NOV 390/87-19-01 | A corporate Level III monitoring program has been implemented to reinforce and calibrate inspection/examination personnel. | Decommit | The NQAP defines Level III activities. |
| 96-032 NCO920048087 | NOV 390/86-20-01 | QA control elements contained in NQAM will be revised to identify individuals for preparing, reviewing, approving documents. | Decommit | The basis for this requirement is the NQAP Section 6. |
| 96-033 NCO920048086 | NOV 390/96-20-01 | QA control elements contained in NQAM will be revised to specify requirements to ensure that appropriate review and approval of documents are accomplished. | Decommit | The basis for this requirement is the NQAP Section 6. |
| 96-034 NCO920048081 | NOV 390/86-20-01 | Revise the Nuclear QA program to ensure that the current ONP procedures system is based on consistent requirements that implement change control commitments. | Decommit | The basis for this requirement is contained in the NQAP. |
| 96-035 NCO960048085 | NOV 390/86-20-01 | The NQAM will be revised to provide clarification of the applicability of ANSI N18.7 versus ANSI N45.2. | Decommit | The basis for this requirement is contained in the NQAP. |

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| 96-042 NCO920048270 | NOV 390/91-04-03 | Establish a process that provides senior management an opportunity to monitor procedure rolldown performance. | Decommit | Senior management will review procedure related issues through the peer team process. |
| 96-043 NCO930216004 | NOV 390/93-40-02 | Guidance has been provided to procedure writers to include adequate detail in the procedure revision log. | Decommit | Process controls in SPP-2.1 adequately establish mechanisms to ensure procedure users are cognizant of procedure changes. |
| 96-045 NCO910109002 | NOV 390/91-04-03 | Revise administrative documents to incorporate (1) prompt transmittal of parallel versions of approved documents, and (2) appropriate use of the terms "effective dates," "implementation dates," etc. | Decommit | The process of approving and distributing procedures will be based on the NQAP requirements. |
| 96-046 NCO940197002 | NOV 390/94-11-01 | SSP-2.03 will be revised to clarify expectations for preparers and reviewers to ensure procedure references are valid. | Decommit | The development process for SPPs/SDPs ensures that sponsors review and approve procedure references and associated implementation relationships. |
| 96-047 NCO920048170 | NOV 390/80-25-01 | TVA has taken steps to decrease the time required to change a procedure. | Decommit | NQAP Section 6 establishes the basis for procedure review. |
| 96-049 and 96-073 NCO950010005 | NOV 390/94-66-02 | Review the procedures associated with the use of source notes for the control of commitments. | Decommit | Adequate process for identifying commitments in procedures is included in SPP-2.1. |
| 96-067 390/87-05-01 | NOV 390/87-05-01 | Source noting of ANSI Standards. | Decommit | WBN procedure to source note ANSIs is discretionary. Specific ANSIs are committed to in the NQAP. |
| 96-068 NCO910109006 | NOV 390/91-04-03 | All late OISL items will have been dispositioned in accordance with SSP-2.04. | Decommit | This commitment was a one time compliance action. New hierarchy removes need for rolldown implementation of corporate upper-tier procedures. |
| 96-069 NCO920048271 | NOV 390/91-04-03 | Procedures were issued to include management controls to administratively "hold" outdated work-related procedures. | Decommit | Procedures will be evaluated by owners to determine if needed to be placed on "Administrative Hold" |

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| 96-076 NCO920048313 | NOV 390/83-40-01 | Updated division of responsibilities for specific sections of the FSAR which are the responsibility of EN DES will be prepared. | TVA will maintain an updated DOR for each FSAR section. | Commitment has been expanded to include all TVA organizations and maintained by Licensing. |
| 96-084 NCO920048298 | NOV 390/81-09-03 | Attachment A of WBN QCP 1.14 has been revised to require specific calibration data. | Decommit | QCP 1.14 no longer exists. NADP-1 requires that the work instructions data sheets are the inspection record. The calibration data is recorded on the work instruction. Current process for M&TE documentation tied to NQAP through NADP-1. |
| 96-087 and 96-0102 NCO890205005 | NOV 390/89-08-03 | Site PM tracking program requires weekly response verifying that monitoring of vault temperature and humidity has been performed. | Decommit | SPP-2.4 establishes requirements for long term storage of records that implement NQAP Section 6.3.2 programmatic requirements. |
| 96-092 NCO920048181 | NOV 390/81-14-01 | Construction test procedures specify operating limitations for safety-related equipment. OPS personnel are now indoctrinated in the requirements of construction test procedures, and an instruction has been implemented controlling documents transmitted from construction. | Decommit | SSP-2.4 controls the record process through the WBN records list. The basis for the controls established in SPP-2.4 is found in Section 6.3.2 of the NQAP. |
| 96-093 NCO920048255 | NOV 390/86-24-01 | Revise work control procedures to provide for document retention so that problems encountered during installation will become permanent plant records. | Decommit | SSP-2.4 establishes controls through the WBN records list to ensure documents and records are maintained and archived. The basis for the controls established in SPP-2.4 is found in Section 6.3.2 of the NQAP. |
| 96-094 NCO890266016 | NOV 390/89-13-02 | QMI 806.5 is presently being implemented to control the use of the signature log. | Decommit | SPP-2.4 requires originating organizations control the authenticity and validity of documents and records. The basis for the controls established in SPP-2.4 is found in sections 6.3.1 and 6.3.2 of the NQAP. |

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| 96-096 NCO900041008 | NOV 390/87-05-01 Vendor Information CAP | Enhancement of site level procedures will improve control and maintenance of vendor information. | Decommit | SPP-2.4 controls the record list process. SSP-2.10 controls vendor manuals/information. The basis for the controls established in SPP-2.4 is found in section 6.3.2 of the NQAP. |
| 96-101 and 96-107 NCO870118025 | NOV 390/86-24-01 | Revise QCI-1.08 to establish controls to ensure the type and quantity of records received and retained. | Decommit | SPP-2.4 controls the processing of all TVAN records and establishes the process for transmitting and documenting records. The basis for the controls established in SPP-2.4 is found in Section 6.3.2 of the NQAP. |
| 96-105 NCO920078006 | NOV 390/92-01-02 | SSP-2.09 has been revised to clarify the guidance for use of late entries. | Decommit | The late entry process has been discontinued and superseded by process controls that are more restrictive and prevent alterations to original records. The record correction notice process is designed to protect the integrity of the documents and establishes an auditable record. |
| 96-124 and 97-022 NCO910098006 | NOV 390/91-03-05 | Revise AI-7.11 to enhance the definition of a programmatic issue and the form to further define appropriate Unit 2 hold items. | Decommit | <p>This commitment was made when WBN U1 and U2 were under construction and numerous items were being identified for both units. Unit 1 now hold a full power license and Unit 2 is in a suspended construction status. The present commitment management process ensures that all NRC commitments are properly identified, tracked, and implemented.</p> <p>Corrective action document processing is implemented through the NQAP, Section 10.0.</p> |

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| 96-125 NCO930031001 | NOD 390/92-26-02 | WBNs program for managing and tracking commitments require timely NRC notification when commitments identified as reportable require revising. | Decommit | TVA has adopted through the commitment management procedure (SPP-3.3) the NRC endorsed NEI commitment management process which ensures proper NRC notification when a commitment scope or hard commitment date is changed. This procedure defines authorized personnel and also adopts the NEI guidelines regarding the definition of a commitment which states that oral statements to take certain actions represent an intent to make a commitment, but does not constitute a commitment until submitted in writing, on the docket, by a designated utility representative. |
| 96-127 NCO920048133 | NOD 390/79-20-04 | Instructions will be issued to notify the site QC&R unit if a commitment date will not be met. The QC&R unit will then verbally notify the OIE inspector. | Decommit | |
| 96-129 NCO920030774 | CNPP - Volume 1 | The Director of Nuclear Licensing and Regulatory Affairs approval is required to change response or completion date for resolving commitments. | Decommit | |
| 96-130 NCO920030773 | CNPP - Volume 1 | A procedure will be written to identify authorized ONP managers and provide methodology for documenting and tracking verbal agreements made by these managers. | Decommit | |
| 97-002 NCO960017002 | IEB 96-01 | For any abnormal rod behavior following a reactor trip during calendar year 1996, the results of the evaluation will be captured in the monthly operating report. | Decommit | The time constraint mentioned has expired and any further reporting of this problem would be handled in the same method as other equipment failures. |
| 97-003 Generic Letter 83-28 | GL 83-28 Response L44910711801 | In response to GL 83-28, an 18 month interval inspection program referencing Westinghouse Maintenance Program Manual-MPM-WOGRTSDS416, dated Nov. 30, 1986 | A refueling interval inspection program not to exceed 24 months referencing Westinghouse-MPM-DS Breaker (6/93). | This is based on the vendors latest program recommendations. This will allow maintenance to be performed off-line. |

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| 97-008 NCO920048247 NCO920048172 NCO920048201 | NOV 390/91-18-05 NOV 390/81-09-04 NOV 390/81-14-08 | Controls put in place to ensure accountability of controlled drawings; a controlled drawing distribution was implemented; drawing holders to turn in drawings for verification. | Decommit | Document control is implemented through SPP-2.3 which implements the NQAP Section 6.2. |
| 97-010 NCO900041001 | Letter dated 3/15/90 Vendor Information CAP | VTMs will be consolidated into vendor technical manuals controlled by DCRM. | Decommit | The NQAP Section 6.2 provides requirements that are also in SSP-2.10 to control vendor information. |
| 97-014 NCO890169013 | NUREG 0737 I.D.1 | Storage method of using multi-ring locking binders will be incorporated for the MCR and simulator. Pages will be laminated. | Decommit | This method of filing controlled manuals is not a regulatory requirement. The current process and self-assessments prevent lost and damaged documents. |
| 97-016 NCO880123005 NCO920048149 NCO920048286 NCO920048150 NCO920048151 NCO920048152 | NOV 390/88-01-01 | CAQR program changes were implemented; (1) timeliness trended; (2) generic reviews are timely; (3) timeframe requirement changes may be granted; (4) management to coordinate CAQRs and track timeframes. | Decommit | Generic reviews, trending, and timeframe requirements are not regulatory requirements. However, the current corrective action process implements generic reviews and timeframe requirements as a management action taken to improve performance. Trend analysis is also a management action implemented through the NQAP, Section 10.0. |
| 97-018 NCO890120006 | NOV 390/89-02-01 | A management review committee is now performing the management review function. | Decommit | Using the Management Review Committee (MRC) is not a regulatory requirement. However, using the MRC is a management action to improve performance. |
| 97-023 NCO920048174 | NOV 390/81-09-03 | QCI 1.2 will be revised to provide clearer guidance on what constitutes a nonconforming condition. | Decommit | 10CFR50 Appendix B, V, XV, and XVI are regulatory requirements committed to and implemented through the NQAP, Sections 6.0 and 10.0. In addition, 10CFR50.72 and 10CFR50.73 are implemented through SPP-3.5. |
| 97-024 NCO920048038 | NOV 390/80-16-01 | Procedure will require prompt notification of the NCR initiator of the NCR number. | Decommit | |

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| 97-025 NCO920048026 NCO920048027 | NOV 390/76-11-A1 | Enhance CAQ program regarding significant conditions and reportability determinations. | Decommit | See 97-023 |
| 97-029 NCO920030776 | CNNP - Volume 1 | CAQs will be tracked and their significance assessed. Root cause will be identified and recommended corrective actions developed. | Decommit | |
| 97-030 NCO890112048 | NPP - Volume 4 | Proposed changes to the corrective actions of the CAPs and special programs will be controlled by site instructions. | Decommit | |
| 97-031 NCO920048067 | NOV 390/86-18-03 | Tracking of housekeeping deficiencies incorporated into QCI-1.36. Revise instruction on tagging for nonconformances to more clearly state the requirements on tag placement. | Decommit | Tracking of housekeeping deficiencies is not a regulatory requirement. 10CFR50 Appendix B, V, and XV are regulatory requirements and implemented through the NQAP, Section 10.0. |
| 97-032 NCO940217010 | NOV 390/94-13-02 | A site business practice will be issued to additional guidance on methods to be used for cause analysis. | Decommit | 10CFR50 Appendix B, V, and XVI are regulatory requirements and implemented through the NQAP, Sections 6.0 and 10.0. |
| 97-038 NCO940217016 | NOV 390/94-13-02 | A site guidebook is being developed to provide additional guidance on SCAR and PER implementation. | Decommit | |
| 97-039 NCO940262006 | NOV 390/94-37-01 | The results of this review will be added to the corrective action program to document applicable criteria. | Decommit | |
| 97-041 NCO950008010 | NOV 390/94-72-01 | During CAQ closure ensure DCNs have been properly statused and closed. | Decommit | |

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| 97-042 NCO920048315 | NOV 390/83-37-01 | The Div of Power Sys Operations has issued their own QA manual which included a procedure entitled "Corrective Action." | Decommit | See 97-032 |
| 97-043 NCO920048319 | NOV 390/86-27-04 | TVA has developed a revised corrective action process and provides for organizational control of generic reviews. | Decommit | Generic reviews are not a regulatory requirement. However, performing generic reviews is a management action taken to improve performance. |
| 97-044 and 97-049 NCO860128001 NCO920048112 NCO940217004 | NOV 390/85-64-02 NOV 390/87-13-01 NOV 390/94-13-01 | Procedures will provide requirements and responsibilities for the reporting process; instructions for the evaluation and reporting of significant CAQs and establishes the required content of reports (10CFR50.55(e)); and requiring potential reportability evaluations. | Decommit | The identification, evaluation, and reporting of adverse conditions are regulatory requirements governed by 10CFR50 Appendix B, 50.72, and 50.73. 10CFR50.73 provides guidance for the contents of each written report (LER). These requirements are implemented at WBN through administrative controls. |
| 97-047 NCO920048236 | NOV 390/86-25-07 | The responsible organization will be required to reconfirm the significance determination during verification of corrective action. | Decommit | Reconfirming significance is not a regulatory requirement. However, reconfirming the significance determination is a management action taken to improve performance. |
| 97-051 NCO870915002 | NOV 391/87-03-03 | In addition to the previous requirements to evaluate for CAQs, documentation of an assessment for damage on the DR form is required. | Decommit | Recent changes to procedures now requires when an adverse condition is identified during PM activities a PER is written. |
| 97-052 NCO930124001 | NOV 390/93-20-03 | A single library procedure for control of computer software was issued which requires escalation and followup for overdue receipt acknowledgments. | Decommit | The control of computer software is done through implementation of SPP-2.6 which implements Section 13 of the NQAP. |
| 97-053 NCO820253007 NCO820253094 | NUREG 0737 I.B.1.2 | Independent Safety Engineering Group (ISEG) to perform independent reviews of plant operations. | Decommit | Requirements for the independent safety engineering function are contained in the NQAP and implemented via admin controls. |

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| 97-055 390/91-03-06 | NOV 390/91-03-06 | In response to the subject NOV, instructions were developed to proceduralize the internal audit activities. | Decommit | The audit and self-assessment process are controlled under the NQAP, Section 6.2 and implemented by SPP-2.3 |
| 97-056 NCO930160001 | NOV 390/93-29-02 | DCRM has revised SAI-18.01 to clarify the specific requirements needed for conducting assessments. | Decommit | |
| 97-059 NOC890112049 NCO890112086 NCO920155006 NCO920155007 NCO920155008 NCO920155009 | NPP - Volume 4 NPP - Volume 4 NOV 390/92-27-06 NOV 390/92-27-06 NOV 390/92-27-06 NOV 390/92-27-06 | Site QA reviews and verifications will be performed of the Corrective Action Programs (CAPs) and Special Programs (SPs). | Decommit | The CAPs and SPs are not a regulatory requirement. The programs were complete prior to operation. Therefore, these commitments are not necessary and can be decommitted. |
| 97-064 NCO910097001 | NOV 390/91-02-01 | Periodic General Employee Training (GET) will incorporate WBN construction project rules and regulations as a reminder to employees of their responsibilities. | Decommit | TVA NQAP, Section 11.0 and WBN FSAR 13.2.2 provide upper tier guidance to ensure the regulatory requirements for general training of employees. The level of control needed for a construction site is different at an operating plant. |
| 97-065 NCO910095005 | NOV 390/90-33-01 | The information (tagging deficiencies) contained in the documents mentioned in the response to the NOV is being conveyed to employees as part of the periodic General Employee Training (GET). | Decommit | TVA NQAP, Section 11.0 and WBN FSAR 13.2.2 provide upper tier guidance to ensure the regulatory requirements for general training of employees. The problem no longer exists to a level that requires specific training beyond that required by the NQAP and FSAR. |