



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

OCT 14 1999

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

Gentlemen:

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

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 10, 1996 through October 18, 1999, 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  
Licensing and  
Industry Affairs Manager

Enclosure  
cc: See page 2

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cc (Enclosure):

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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
96-036 NCO920048089 NCO920048082 NCO920048088	NOV 390/86-20-01	The Nuclear Quality Assurance Manual will be revised to specify proper review and approval of non-intent changes.	Decommit	The Nuclear Quality Assurance Plan (NQAP) establishes controls for changes to procedures and instructions and defines minor changes. Changes to the NQAP are controlled by 10 CFR 50.54(a) and content control by this commitment is not required.
96-048 NCO920048282	NOV 390/90-14-01	AI-1.19 includes requirements for the reviewer to ensure documented technical justification exists for conditions which exceed design limitations or removes protected features.	Decommit	Design changes and documentation for these changes are controlled by the NQAP.
96-050 NCO830138012	NUREG 0737, I.D.2	Procedures containing instrument loop calibration of sensors that input to the SPDS will include verification that values are correct.	Decommit	This is a pre-operational commitment and was completed before fuel load with the revisions of SIs that included verification of SPDS display values.
96-051 NCO920048177	NOV 390/81-14-01	(Partial) TVA will continue to enforce the requirement that operating limitations are specified in test procedures.	Decommit	The NQAP, Section 6 requires that procedures include quantitative and qualitative acceptance criteria. This is implemented in SPP-2.2.
96-064 N/A	Vendor Information CAP	Procedures agree with and references applicable vendor information.....	Decommit	The NQAP, Section 6 controls procedures and instructions. SPP-2.2 implements the NQAP requirements and ensures that procedures agree with and reference applicable vendor information.
98-007 NCO900142002	NOV 390/90-14-01	A training module will be developed to provide formal training for potential test directors and retraining for existing test directors.	Decommit	The training department is no longer required to maintain a training module on conduct of test procedure. The knowledge and experience can be demonstrated through formal training or a documented evaluation of performance.

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98-015 NCO900041005	NOV 390/87-05-01 Vendor Information CAP	VTMs will be reviewed during plant prodeures upgrade program. Plant prodeures will use VTM as input and will be reconciled to them when issued.	Decommit	Plant procedures upgrade progam is complete. Administrative controls are in place to ensure changes to vendor information is reviewed. NQAP, Section 6, "Control of Documents and Records," is the basis for this control.
98-019 NCO890112112	NPP - Volume 4	Develop and implement an administrative procedure hierarchy.	Decommit	SPP-2.0, "Procedures and Document Contr contains the procedure hierarchy. The NQAP, Section 6 is the basis for control of procedures and instructions.
98-021 NCO960005001	NOV 390/95-80-05 LER 390/95-004	SSP-2.55 was revised to include management expectations regarding when a procedure must be terminated before the end of the procedure.	Decommit	The NQAP, Section 6 controls procedures and instructions. No additional performance problems have been identified in this area.
98-022 NCO920053060	Generic Ltr 83-28	AI-9.2 requires the critical structures, systems, and components (CSSC) maintenance request (MR) to refer to or become a PORC reviewed instruction.	Maintenance Instructions (MIs) are reviewed by an Independent Qualified Reviewer (IQR)...	MIs are now reviewed by an IQR instead of PORC.
98-022 NCO840202003	Generic Ltr 83-28	TVA is to report NPRDS failures within 90 days of discovery.	Decommit	Reporting to NPRDS has been terminated per memo from INPO dated 3/26/97 and replaced by EPIX.
98-023 NCO930244002	NOV 390/93-58-02	Revise SSP-6.02 to state that a 10 CFR 50.55(e) screening form is not required and to provide examples of conditions representative of a PER which requires reportability review.	Decommit	10 CFR 50.55(e) reportability is not applicable to an Operating Licensed Unit. Sufficient guidance for when a PER is needed is contained in the Corrective Action Program.
98-023 NCO880255004 NCO880257004	NOV 390/87-07-01	Revise maintenance procedures to incorporate design output requirements.	Decommit	Maintenance activities are required to comply with all design output in performance of work, the specification of the referenced Engineering Requirements (ER) Spec in the maintenance management system procedures is redundant and is no longer needed.

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98-023 NCO950082008	Def 390/95-202-04	SSP-6.02 has been revised to incorporate guidance for determining when NE involvement in maintenance activities should be required.	Decommit	Maintenance planners and engineers are familiar with these guidelines and based upon performance, specific procedure guidelines are no longer needed.
98-023 NCO950099001	NOV 390/95-52-01	SSP-6.02 has been revised to clearly identify the requirement that Operations sign-off be obtained prior to the work document being placed in any closure status in the "computer work control system."	Decommit	Based upon acceptable performance, a new electronic computer system, and the maintenance management system procedures being sequenced to perform closure coding after Operations approval, the need to proceduralize status coding is not needed.
98-024 NCO920048003	NOV 390/82-09-02	Create a controlled single listing identifying systems, structures, and components covered by the QA program.	Decommit	The NQAP requirements remain in place as upper tier to TVAN component classification procedures.
98-026 NCO850404374	SER Section 7.7.2	Implement on an interim basis to handle the intent of RG 1.47 an administrative procedure that requires the alignment of all systems and components important to safety be verified prior to unit startup.	Decommit	This commitment was made a License Condition as stated in the original SER. NRC considered the License Condition fully resolved in SSER 7.
98-028 NCO940274001	NOV 390/94-58-03	Periodic requirements contained in site administrative procedures will be tracked and scheduled using appropriate management controls such as the Surveillance Program Matrix.	Decommit	This was a management action taken to improve performance. WBN has not experienced any additional problems in this area.
99-002 NCO920048262	NOV 390/80-35-01	When a QA problem is identified or work is being performed without an approved procedure, QA will initiate stop work action.	Decommit	NQAP, Section 10.2.6, controls stop work activities. This is implemented through an administrative process.
99-004 NCO900041003 NCO900041004	390/87-05-01 Vendor Information (VI) CAP	For inconsistencies between vendor technical information in upgraded manuals and existing vendor manuals/documents, an Open Item Report will be generated and tracked.	Decommit	All discrepancies were resolved prior to closure of the Vendor Information Corrective Action Program. This program was completed prior to fuel loading and is historical in nature.

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99-006 NCO950008003	NOV 390/94-72-01	SSP-2.10 will be revised to clarify requirements for using vendor information.	Decommit	The enhancements put in place were appropriate for a construction environment where there was a large and dynamic work force. The current static work force does not exhibit characteristics which justify these measures.
99-007 NCO950008005	NOV 390/94-72-01	The revision to SSP-2.10 will include additional requirements for documenting vendor technical manual review results.	Decommit	
99-009 NCO940274002	NOV 390/94-58-03	SSP-12.01 will be revised to clarify differences between night orders and standing orders and clarify requirements regarding those authorized to approve them.	Decommit	This was a management action taken to improve performance. WBN has not experienced any additional problems in this area.
99-010 NCO920053040	Generic Ltr 86-04	WBN plans to provide engineering expertise on shift in the form of a dedicated shift technical advisor (STA).	Decommit	This is a requirement contained in the WBN Technical Specifications.
99-012 NCO920042327 NCO820253010 NCO820253002 NCO820253001 NCO820253003 NCO820253011 NCO820253084 NCO820253085 NCO890169014	NUREG 0737	TVA will implement procedures which establish a clear line of authority and responsibility in the event of an emergency, establish command duties, define shift supervisor responsibilities, STA requirements, shift manning requirements, designate the person in charge of personnel access to the MCR, verify correct operating activities by demonstrating system operability and requiring shift supervisor approval to work on safety related systems, and limit the number of personnel in the control rooms.	Decommit	These commitments are within the scope of the WBN Technical Specification.
99-013 NCO900027002	NOV 390/89-20-02	Independent verifications for equipment clearances will be reimplemented for each system on completion of prestart testing.	Decommit	This commitment was a pre-license item and was completed prior to fuel load. The NQAP implements RG 1.33 requirements that independent verification shall be required where appropriate.

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99-015 NCO960048001	LER 390/96-020 NOV 390/96-09-07	Independently verify all delta-P instrument valve positions except the instrument equalization valve.	Decommit	The NQAP implements RG 1.33 requirements that independent verification shall be required where appropriate.
99-018 NCO850404379  NCO920042029	SER, Section 8.3.3.6	Fuses will be periodically checked for proper size, deterioration, tightness and cleanliness. In lieu of field testing by resistance, WBN proposes to establish a fuse inspection and maintenance program.	Decommit	The specifics of these commitments are more clearly defined in the WBN UFSAR and SER.
99-020 NCO950003005	NOV 390/94-73-02	SSP-12.03 will be changed to require verification by Operations of work completion prior to release of the hold order and require second verification of clearance boundary.	Decommit	This commitment was a pre-license issue which has been completed.
99-023 NCO880234018	DBVP CAP	Software will be provided to better facilitate user access and data retrieval to ensure that ties between commitments and the implementing documents can be made.	Decommit	This is not a regulatory commitment but was a management action taken to improve performance. The software put in place to implement this commitment is obsolete and is no longer used. Several electronic mechanisms are in place for data retrieval at WBN. NRC commitments are controlled through SPP-3.3.
99-024 NCO850404396	WBN SSER 4	The boron-dilution alarm system will be tested every 18 months, bistables will be tested monthly, and annunciator circuits will be tested each shift.	Decommit	The frequency of the channel calibration and channel functional tests for the source range are within the scope of the WBN Tech Spec. The alarm circuits are tested per the requirements of the shift periodic instruction.

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99-025 NCO820253009 NCO820253083 NCO820253086 NCO920030225 NCO920030257 NCO920030260 NCO920042144	NUREG 0737	Review and revise shift turnover procedures, relate abnormal conditions to oncoming shift, review panel checklists each shift, check for burned out lamps at shift change, and ensure the availability/operability of non-redundant window, audible alarm, and alarm card each shift.	Decommit	Items 1, 2, and 3 are within the scope of the WBN Tech Spec, Section 5.7. In addition, items 2, 3, 4, 5, 6, and 7 are consistent with standard industry practices and inherent in WBN conduct of operations.