

August 29, 1995

APPLICANT: Tennessee Valley Authority (TVA)

FACILITY: Watts Bar Nuclear Plant, Unit 1

SUBJECT: MEETING SUMMARY - AUGUST 23, 1995, MEETING WITH THE TENNESSEE VALLEY AUTHORITY REGARDING ADMINISTRATIVE REQUIREMENTS RELOCATED FROM THE WATTS BAR UNIT 1 FINAL DRAFT TECHNICAL SPECIFICATIONS (TAC M76742)

REFERENCE: Meeting notice by P. S. Tam, August 18, 1995

On August 23, 1995, NRC and TVA representatives met in the NRC offices at One White Flint North, Rockville, Maryland, to discuss administrative requirements that were present in the proof-and-review version of the Watts Bar Unit 1 Technical Specification, which have been relocated from the final draft version. The staff's concerns have been set forth in a letter, P. S. Tam to O. D. Kingsley (TVA), dated August 11, 1995. The Enclosure is a list of participants.

TVA provided a proposed response (Enclosure 2) to the staff's August 11, 1995, letter. Participants discussed the issues in the proposed response.

TVA committed to examine the proof-and-review version against the final draft version, and will enter all relocated administrative requirements into the TVA Quality Assurance Program (where changes are controlled under 10 CFR 50.54(a)). TVA also agreed to consider an outstanding staff question regarding the off-site safety review committee responsibility described in the proof-and-review version with respect to 10 CFR 50.59 reviews. TVA will also remove all such administrative requirements if they have been entered into the Final Safety Analysis Report, Chapter 13, by Amendment No. 90 or a later amendment. The staff stated that such action, when satisfactorily implemented, will resolve the staff's concerns. The staff will review TVA's formal response to the August 11, 1995, letter, and the corresponding FSAR amendment.

Original signed by

Peter S. Tam, Senior Project Manager  
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Docket No. 50-390

Enclosures: 1. Participants list  
2. TVA's proposed response

cc w/enclosure: See next page

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WATTS BAR NUCLEAR PLANT

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MEETING REGARDING RELOCATED ADMINISTRATIVE REQUIREMENTS

ONE WHITE FLINT NORTH, ROCKVILLE, MARYLAND

August 23, 1995

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Affiliation

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ENCLOSURE 1

## PROPOSED RESPONSE TO NRR REQUEST FOR ADDITIONAL INFORMATION

### General Response

The TVA Nuclear Quality Assurance Program (NQAP) provides direction and implements quality assurance requirements derived from regulatory requirements, national codes and standards, and other TVA commitments. NQAP requirements are then implemented by TVAN documents sponsored by various organizations. To ensure the NQAP is fully integrated and implemented, procedures and instructions address additional implementing level details contained in requirement documents on which the NQAP is based. Thus, the implementing documents are extensions of the NQAP. Documents implementing NQAP requirements are marked "quality related," and meet the following NQAP requirements:

- Include or provide appropriate reference to technical, QA, regulatory, and licensing requirements, including those in design output documents.
- Receive a documented review by a qualified reviewer other than the preparer.
- Receive a review by Nuclear Assurance and Licensing personnel or others knowledgeable of QA requirements to ensure proper incorporation of QA requirements.
- Organizations responsible for preparing, reviewing, approving and issuing procedures and changes thereto shall be specified.
- Before their implementation, procedure changes are reviewed and approved by the same organization that performed the original review and approval.
- Reviewers are knowledgeable of the requirements and intent of the original document, and have access to pertinent background information on which to base their approval.

The NQAP states changes to the NQAP are made in accordance with the requirements of 10 CFR 50.54a. TVA considers WBN FSAR sections 13.4, 13.5, and 13.6 to be requirements of the NQAP, and therefore under 10 CFR 50.54a change control. In order to strengthen the tie between the NQAP, TVA plans to revise the NQAP to specifically reference these sections of the FSAR in Table 1 of Appendix B.

## Detailed Response - PORC/Technical Reviewers

<u>RAI Question</u>	<u>TVA Response</u>
1. a)	<p>FSAR section 13.4.1.1.a.2 requires PORC to identify the procedures PORC is required to review. The process for approving temporary changes described in section 13.5.1.2 does not add to the list of procedures otherwise identified as requiring PORC review. Thus, deleting reference to this process did not diminish this PORC function, but did eliminate possible confusion.</p> <p>PORC's responsibility regarding temporarily approved procedure changes, as stated in FSAR section 13.5.1.2, need only be (and is) referenced in FSAR section 13.4.1.1.a.3, which defines PORC's function to approve or disapprove procedures identified in section 13.4.1.1.a.2. FSAR section 13.4.1.1.a.3 is consistent with its counterpart Tech Spec section 5.5.1.1.a.3 (April 1994).</p>
1. b)	<p>FSAR section 13.4.1.1.a.4 was written to be consistent with language used in TVA's 10 CFR 50.59 program, as described in TVAN Standard STD-12.13, and WBN Site Standard Practice SSP-12.13, "10 CFR 50.59 Evaluations Of Changes, Tests, and Experiments." A "safety assessment" (SA) is a screening process to determine if a proposed change, test, or experiment is safe and if a safety evaluation (SE) or Tech Spec change is required. SEs determine if an unreviewed safety question (USQ) exists. Personnel performing/reviewing SAs, as a minimum, are senior engineers and selected managers that have completed required training (Level I qualified). SE's may be prepared by Level I personnel, but must be reviewed by personnel who have also passed a certification board (Level II qualified). Since a given PORC review item may not require an SA be performed, FSAR section 13.4.1.1.a.4, as written, has not diminished PORC's responsibility to assess review items for the existence of a USQ, as explained below:</p> <ul style="list-style-type: none"><li>● SA not performed - PORC must concur. If PORC agrees SA not required, then by default PORC has determined a USQ does not exist.</li><li>● SA performed; concluded an SE not required - if PORC concurs, again it has by default determined a USQ does not exist.</li><li>● SE performed - PORC must review as required by section 13.4.1.2.a.3.</li></ul>
1. c)	<p>A "major change" is any change not defined as "minor" in NQAP section 6.1.2.F.3; which states "minor changes" are "inconsequential editorial corrections that do not affect the outcome, results, functions, processes, responsibilities, and requirements of the performance of procedures or instructions, do not require the same review as the original, but shall be reviewed and approved as defined in controlling documents." Implementing procedures changed the terminology to "non-intent," but the meaning is unchanged.</p>

- 1. d) Review oversight - "an" will be changed to "and."
- 1. e) The NQAP states general requirements for generating records, and commits to ANSI N18.7 (1976). Specific requirements for PORC records are detailed in quality related procedure SSP-12.54, "Plant Operations Review Committee Charter," which identifies the NQAP and ANSI N18.7 as source documents. SSP-12.54 records requirements satisfy those given in the NQAP and ANSI N18.7, and are not diminished from the requirements previously specified in section 5.5.3 of the April 1994 Draft Tech Specs. Also see question 7. b) response.
- 1. f) See "General Response."

## Detailed Response - ISEG

<u>RAI Question</u>	<u>TVA Response</u>
2. a)	The only direct reference to ISEG in the NQAP is in the identified section. However, the NQAP refers to the TVAN Organization Description (TVA-NPOD89), which identifies the site organizational responsibilities for ISEG.
2. b)	See "General Response."
2. c)	See "General Response."
2. d)	The NQAP commits to NUREG 0737, Item I.B.1.2, which provides the detail for records to be generated by the ISEG. See also the response to 7. b). This is consistent for all TVAN plants.
2. e)	The TVA-NPOD89-A Nuclear Power Organization Description clearly shows the independent reporting chain of the personnel performing the ISEG function in accordance with the requirements contained in NUREG 0737, Item I.B.1.2. By showing the reporting chain, this also indicates the upper level management designating the ISEG personnel.

## Detailed Response - NSRB

<u>RAI</u> <u>Question</u>	<u>TVA</u> <u>Response</u>
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- 3. a) As committed to in the NQAP, ANSI N18.7 and ANSI N18.1 provide the specific requirements regarding NSRB functions, responsibilities, etc.
- 3. b) See "General Response."
- 3. c) The NQAP commits to ANSI N18.7 (1976), which provides the detail for records to be generated by the NSRB. See also the response to 7. b). This is consistent for all TVAN plant.
- 3. d) NSRB qualification requirements are as specified in ANSI N18.1 (1971) as committed to in the NQAP.
- 3. e) NSRB functions are as specified in ANSI N18.7 (1976) as committed to in the NQAP.
- 3. f) See response to question 3. a) above.
- 4. a) The present terminology, "equipment," carries the same connotation as "component," and meets the intent of wording in the April 1994 Draft Tech Specs, and is consistent with the Tech Specs of the other TVAN plants.
- 4. b) The present NQAP listing of audits in section 12.2.E.4 includes all items formerly listed in the April 1994 Draft Tech Specs as referenced below:

Radiation Protection Program	NQAP ¶ 12.2.E.4.j.
Process Control Program	NQAP ¶ 12.2.E.4.l.
Offsite Dose Calculation Manual	NQAP ¶ 12.2.E.4.a. & k.
Primary Coolant Sources Outside Containment	NQAP ¶ 12.2.E.4.a.
In Plant Radiation Monitoring	NQAP ¶ 12.2.E.4.j.
Post Accident Sampling	NQAP ¶ 12.2.E.4.a.
Radioactive Effluent Controls Program	NQAP ¶ 12.2.E.4.a.
Radiological Environmental Monitoring Program	NQAP ¶ 12.2.E.4.i.
Component Cyclic or Transient Limit Program	NQAP ¶ 12.2.E.4.a.
Inservice Inspection Program	NQAP ¶ 12.2.E.4.a. & d.
Inservice Testing Program	NQAP ¶ 12.2.E.4.a.
Steam Generator Tube Surveillance Program	NQAP ¶ 12.2.E.4.a.
Secondary Water Chemistry Program	NQAP ¶ 12.2.E.4.a.
Ventilation Filter Testing Program	NQAP ¶ 12.2.E.4.a.
Explosive Gas and Storage Tank Rad. Monitoring Program	NQAP ¶ 12.2.E.4.a.
Diesel Fuel Oil Testing Program	NQAP ¶ 12.2.E.4.a.
Fire Protection Program	NQAP ¶ 12.2.E.4.f.

- 4. c) TVA considers the present wording for this item to be appropriate and consistent with other TVAN plants. Audit subjects are extended offsite as needed through other audit modules, for example, section 12.2.E.4.d.
- 4. d) NQAP section 12.2.E.2 is only applicable to SQN and BFN, and is correct as stated.
- 4. e) The NQAP commits to ANSI N18.7 and N45.2.12. The latter specifies audit reports be distributed to appropriate management within 30 days.
- 4. f) The NQAP commits to ANSI N18.7 (1976), which provides the detail for records to be generated by the NSRB. See also the response to 7. b). This is consistent for all TVAN plant.

### Detailed Response - Procedure Review/Approval

<u>RAI</u> <u>Question</u>	<u>TVA</u> <u>Response</u>
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5. a) NQAP section 6.0 and FSAR sections 13.4.1.1.a.3 and 13.5.1.2.

### Detailed Response - Temporary Procedure Changes

<u>RAI</u> <u>Question</u>	<u>TVA</u> <u>Response</u>
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6. a) The suggested change is not required because the NQAP is applicable to SQN and BFN as well as WBN. SQN and BFN have Tech Spec requirements for the control of temporary changes. Also see "General Response."

### Detailed Response - Record Retention

<u>RAI</u> <u>Question</u>	<u>TVA</u> <u>Response</u>
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7. a) TVA will delete.
7. b) Record retention requirements are adequately addressed by the QA Program (10 CFR 50, Appendix B, Criteria XVII) and the related QA Plan. Numerous other regulations such as 10 CFR 20, subpart L, 10 CFR 50.71, etc., also provide for record retention. Implementing procedure SSP-2.09, Records Management," controls the identification of retention times for all QA records. Implementing procedures identify which records they produce are QA and which are non-QA. The above provides sufficient control of the recordkeeping provisions formerly in TS 5.10. Also see "General Response."

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