

Docket Nos.: 50-390 and 50-391

> Mr. S. A. White Manager of Nuclear Power Tennessee Valley Authority 6N 38A Lookout Place 1101 Market Street Chattanooga, Tennessee 37402-2801

Dear Mr. White:

Subject: Request for Additional Information Concerning the Project Management Plan for the Department of Energy Weld Evaluation Project for the Watts Bar Nuclear Plant, Units 1 and 2

The NRC staff has been reviewing your Project Management Plan (PMP) for the Department of Energy Weld Evaluation Project for the Watts Bar Nuclear Plant, Units 1 and 2 described by your letter dated May 23, 1986, (R. Gridley to H. R. Denton) and the June 25, 1986 presentation by your staff in Bethesda. The plan needs further amplification and clarification before we can complete our review. Enclosed are questions and comments on technical and programmatic aspects that need to be resolved.

As discussed in the enclosure, the staff has concluded that a demonstration that welds are "suitable-for-service on a statistical 95/95 basis (i.e., there is a 95% confidence level that 95% of welds in a given population are "suitable-forservice") is not equivalent to TVA's FSAR commitment to meet specific industry codes and standards unless specifically provided for in the individual codes. In addition, the staff has concluded that, since Watts Bar Unit 1 is still under construction, Section III of the ASME B&PV Code is the applicable section of the code for any modifications or testing of ASME scope components. Further clarification of these positions can be found in the enclosure to this letter.

We request that you provide your response to these questions and comments one month from the date of receipt this letter. If you have any questions concerning this matter, please contact W. Long at FTS 492-9477.

Sincerely,

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B. J. Youngblood, Director PWR Project Directorate #4 Division of PWR Licensing-A

Enclosure: As stated

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Mr. S. A. White Tennessee Valley Authority

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Watts Bar Nuclear Plant

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Mr. Mark J. Burzynski Tennessee Valley Authority Watts Bar NP P.O. Box 800 Spring City, Tennessee 37381

## DOCKET NUMBERS 50-390/391 WATTS BAR UNIT 1 WELDING EVALUATION PROJECT PLAN REQUEST FOR ADDITIONAL INFORMATION

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- Provide a listing of the population groups selected for reinspection, including the basis for the establishment of each population and sample selection. Link specific employee concerns to the applicable populations. Also provide a list of systems/areas which were not included in the populations established for reinspection, and the basis for not including the system(s) in any of the populations established for reinspection. Describe your safety classifications and their correlations with NRC classifications.
- 2. Your handouts for the June 25 meeting provided flow charts for assessment and disposition, multiple sampling plans, generic problem analysis, project procedures, etc. Provide a full description of each "logic block" and its relationship to preceding and following blocks. In addition, provide an example of the operation of the block with a specific problem. In particular, discuss the conditions that would result in an expansion of the sample size and the conditions that would result in 100% reinspection of a given population.
- 3. The staff does not accept your position in the Project Management Plan that a demonstration that welds are "suitable-for-service" on a statistical 95/95 basis; i.e., 95% confidence level that 95% of welds in a given population are "suitable-for-service," is equivalent to your FSAR commitment to meet specific industry codes and standards unless specifically provided for in the individual codes. Such deviations, and your evaluation, must be documented and approved by the staff. For each homogeneous population group, you must make a finding first whether original commitments have been implemented. If the original commitments have not been implemented, you must identify the deviations, document your evaluations, and provide the basis for their acceptability for staff review and approval. In determining whether you have implemented your commitments, a distinction must be made between the programmatic aspects and the field implementation of your program.

- 4. In the June 25, 1986 meeting, when the specific issue regarding fit-up inspection was discussed, your contractor stated that QA/QC aspects related to welding are not included in the scope of the DOE/EG&G review. The staff believes that, in order to make a finding whether original licensing comitments have been met, QA/QC aspects must be included and addressed. Because QA/QC aspects related to welding are presently not included in your Project Management Plan for welding, discuss how you intend to factor QA/QC aspects into your determination whether you have implemented your original commitments; i.e., you have in place procedures that meet the 10 CFR 50 Appendix B and applicable ANSI N45 series standards and that these procedures have been executed in the field.
- 5. Provide a schedule for the activities covered by the Project Management Plan.
- 6. Discuss the possible application of this plan to Watts Bar Unit 2.
- 7. On page 45 of the June 25 meeting transcript, 3000 quality indicators were stated to affect welding at Watts Bar Unit 1, and that these 3000 indicators were reduced to 122 categories of potential problems. Discuss the sources of the quality indicators and identify the 122 categories that are being addressed in this plan.
- 8. As specific employee concerns regarding welding are resolved by population group, provide applicable subcategory reports periodically to allow for a progressive evaluation of your results.
- 9. How are inaccessible welds to be addressed in each population?
- 10. What were the Preservice Inspection (PSI) results for Watts Bar Unit 1? Are the results of this PSI to be incorporated in this Welding Project Plan?
- Describe the internal procedures for the Employee Concern Task Group addressing assignment of concerns, identification of issues, closing of issues, etc., as discussed on page 129, line 21 through page 130, line 10 of the June 25 meeting transcript.

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12. Provide a copy of your report on magnetic particle inspection through paint for the detection of cracks. Also describe your means of qualifying inspectors for this procedure.

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- 13. Provide your detailed plan (including a schedule) for addressing welds in vendor made components.
- 14. Regardless of the status of your ANI inspections, the staff considers Watts Bar Unit 1 still under construction. Therefore, Section III, not Section XI, of the ASME B&PV Code is still applicable for any modifications or testing of ASME scope components. For each deviation from Section III, you must identify the deviation, evaluate the deviation, provide the bases for acceptance, or any corrective action, and submit the findings for staff review and approval.
- 15. With respect to the issue related to your preliminary findings on the radiographs for the ASME scope welds, the staff considers them extremely significant. The staff also understands that you have issued a Request for Proposal (RFP) for a reassessment of approximately 1500 radiographs. Provide a status summary of your investigation to date and a copy of your RFP.

24 JUL 1986

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