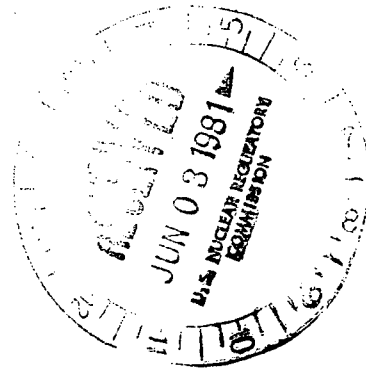


TENNESSEE VALLEY AUTHORITY
 UNITED STATES DEPARTMENT OF ENERGY

400 Chestnut Street Tower II

May 29, 1981

SQRD-50-328/81-37
 BLRD-50-438/81-34
 BLRD-50-439/81-37
 WBRD-50-390/81-45
 WBRD-50-391/81-44



Mr. James P. O'Reilly, Director
 Office of Inspection and Enforcement
 U.S. Nuclear Regulatory Commission
 Region II - Suite 3100
 101 Marietta Street
 Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNIT 2, BELLEFONTE AND WATTS BAR NUCLEAR PLANTS
 UNITS 1 AND 2 - REVISIONS TO THE PROGRAM REQUIREMENTS MANUAL -
 SQRD-50-328/81-37, BLRD-50-438/81-34, BLRD-50-439/81-37,
 WBRD-50-390/81-45, WBRD-50-391/81-44

The subject condition was initially reported to NRC-OIE Inspector
 R. V. Crlenjak on April 29, 1981, in accordance with 10 CFR 50.55(e) as
 a Watts Bar Nuclear Plant Audit Deficiency M81-3. During the review of
 this deficiency for Watts Bar, it was found to be applicable to Bellefonte
 and Sequoyah Nuclear Plants. Enclosed is our final report.

If you have any questions, please get in touch with D. L. Lambert at
 FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
 Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Director (Enclosure) ✓
 Office of Inspection and Enforcement
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

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ENCLOSURE
SEQUOYAH NUCLEAR PLANT UNIT 2
WATTS BAR AND BELLEFONTE NUCLEAR PLANTS UNITS 1 AND 2
REVISIONS TO THE PROGRAM REQUIREMENTS MANUAL
SQRD-50-328/81-37
BLRD-50-438/81-34, BLRD-50-439/81-37, WBRD-50-390/81-45, WBRD-50-391/81-44
FINAL REPORT

Description of Deficiency

TVA internal requirements specify that the Program Requirements Manual be reviewed and updated every six months. This six-month review had not been performed since the manual was issued in November 1977. Sections were revised and added as needed but no specific review of the whole manual was performed.

During an audit at Watts Bar, the auditor discovered that the PRM was not being used as a basis for review and approval of site procedures and instructions as required by QASP-4.2, RO, because the tables in the PRM which listed applicable codes and standards could not be completely relied upon. Subsequent investigation showed this deficiency also existed at Sequoyah and Bellefonte which utilized the PRM.

These tables were initially developed by extracting the codes and standards which TVA had committed to from the Safety Analysis Report (SAR) documents. Several attempts had been made to revise, reduce, or eliminate these tables over a three-year period but, because of the complexity of the tables and lack of priority, those attempts had not resulted in a revision.

Safety Implications

If the PRM had not been corrected, it is possible that an earlier code or standard than is presently being specified could be used to perform safety-related activities. There is also the possibility that a code or standard is not specified that should be because there was no commitment in the original SAR or the commitment was made in a latter SAR amendment. Incorrect application of codes or standards could have led to inadequate quality.

Since construction activities are controlled by design drawings, Construction specifications, purchase documents, and Quality Assurance/Quality Control (QA/QC) procedures, the possibility of inadvertent direct use of the PRM as an input to these documents by engineers, designers, or QA/QC employees was investigated. No case could be found where this happened, and the investigation showed that a minimum of two people (a preparer and reviewer) would have to be solely relying on the information in the PRM.

Corrective Action

A complete review of the PRM has been performed. Numerous minor changes were identified. Except for the two tables of codes and standards, it was determined that no safety question was involved. The tables were removed and a statement put in their place. The statement describes the bases for the tables, why they were removed from the PRM, and refers users to design criteria, specifications, and drawings for identification of codes, standards, and guides for the particular system or feature of interest.