

B19  
9/2

**TENNESSEE VALLEY AUTHORITY**

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

August 29, 1986

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

My letter to you dated August 6, 1986, "TVA Employee Concerns Program Information and Schedule Regarding Sequoyah Nuclear Plant," committed to provide the program description and implementing procedures for the TVA Watts Bar Nuclear Plant (WBN) Employee Concerns Task Group (ECTG) activities relative to the TVA WBN Employee Concerns Special Program (ECSP). Revision 2 to these documents are provided as enclosure 1 to this letter. Additionally, the program description and procedures have been supplemented by an ECSP Report Writers' Guide. This was developed to assist ECTG personnel by providing detailed guidance on the format and content of ECTG reports. This Writers' Guide is provided as enclosure 2 to this letter.

By way of background, revision 1 of the ECTG Program Manual was provided to your staff informally on June 10, 1986 at a meeting held at WBN regarding this program. Substantive changes between revision 1 and the current revision 2 of this manual were discussed with members of your staff in a working-level meeting held in the NRC offices in Bethesda on August 12, 1986. At that time, revision 2 had not been finalized. Comments provided by your staff have been considered in the approved revision 2. The significant changes between revision 1 and revision 2 include:

1. Nuclear Safety Review Staff (NSRS) "classical" issues and the Stone & Webster Engineering Corporation (SWEC) systematic assessment items have been removed from the scope of the ECSP. These items will remain the responsibility of the ECTG for final resolution and evaluation is underway. Many of the same procedures will be used for these items as are used for employee concerns. However, since these issues did not originate as TVA employee concerns and since resolution cannot be effected in the same manner, they have been removed from the ECSP program description. A separate program plan has been prepared and enclosure 3 is a copy of the this plan (ECTG M-2) which describes the process for evaluation and closure of these items.
2. Definition of Safety Related - This definition has been revised to provide consistency with the definition used in the TVA Nuclear Quality Assurance (QA) Manual.

*ADD: GARY ZECH, REGION II  
TOM POINDEXTER*

*DO 25  
1/1*

8609040064 860829  
PDR ADDCK 05000390  
A PDR

Mr. Harold R. Denton, Director

August 29, 1986

3. Restart Implementation Plans for Particular Plants - Revision 2 of the ECSP Program Manual provides for the development of plant specific employee concern evaluation plans if the entire ECSP effort cannot be completed before proposed plant restart. This provision is being utilized to support the Sequoyah Nuclear Plant restart schedule. In accordance with the program requirements, a Sequoyah Restart Implementation Plan has been prepared and approved. This plan includes reporting and reviewing responsibilities, definition of Sequoyah elements for evaluation, and Sequoyah schedule information. This restart plan is included in this submittal as enclosure 4. (Note: The schedule information and definition of elements which are part of this plan are still under revision as additional information is provided by the evaluation groups. NRC will be updated as revisions occur.) Additionally, in implementing the program plan for NSRS and SWEC issues, ECTG defined those required to be evaluated and resolved for Sequoyah restart. Enclosures 5 and 6 provided lists of NSRS and SWEC issues related to Sequoyah restart respectively.
4. Corrective Action Responsibilities - Revision 2 of the Program Manual has included enhanced corrective action tracking requirements including the use of a standardized form for documentation of the finding, approved corrective action plan, and final corrective action verification. Responsibilities for corrective action verification and closure have been clarified.
5. Senior Review Panel (SRP) - The role of the SRP has been clarified in the Program Manual and in the Sequoyah Restart Implementation Plan.

QA Relationship - Since the efforts of the ECTG are unique, the ECTG Program Manager has chosen to invoke certain aspects of an Appendix B QA program which are applicable to the ECTG's scope. Such areas include QA record definition, auditing responsibilities, personnel training requirements, etc. Revision 2 of the Program Manual has attempted to clarify this relationship and better define the QA applicability.

The program for employee concerns within the ECTG's responsibility is fully described by enclosures 1 and 2 to this letter. The handling of the SWEC items and NSRS "classical" items is in enclosure 3. As such, these program descriptions supersede any previously docketed program. With these submittals, TVA commits to complete these programs in accordance with the procedures provided to you. However, revisions to these documents will be

Mr. Harold R. Denton, Director

August 29, 1986

made as necessary to reflect program changes without prior notification to NRC. NRC will be notified if any major changes to the programs described in these submittals are made. Should you have any questions regarding this program, please telephone Martha S. Martin, ECTG Licensing Coordination, Watts Bar Nuclear Plant, (615) 365-3842 or 365-3787.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
R. L. Gridley, Director  
Nuclear Safety and Licensing

Enclosures

cc (Enclosures):

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street NW, Suite 2900  
Atlanta, Georgia 30323

Mr. James M. Taylor, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Director of Nuclear Reactor Regulation  
Attn: Mr. B. J. Youngblood, Project Director  
PWR Project Directorate #4  
Division of PWR Licensing-A  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555