TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

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JUN 29 1989

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - REVISION TO CORRECTIVE ACTION PROGRAM (CAP) PLAN FOR DESIGN BASELINE AND VERIFICATION PROGRAM (DBVP)

References: 1. Letter from TVA to NRC dated October 20, 1988, providing CAP plan for DBVP

2. Letter from NRC to TVA dated March 9, 1989, providing meeting summary and action items for the February 7 and 8, 1989, meeting concerning WBN CAP plans

Enclosed is the revised DBVP CAP. This document has been revised to address NRC's comments raised in the February 8, 1989, presentation of the DBVP CAP plan as documented in reference 2.

TVA's response to NRC's comments regarding the DBVP CAP presentation on February 8, 1989, is included in enclosure 2. Commitments relative to the DBVP CAP are summarized in enclosure 3.

NRC review and subsequent endorsement of the revised CAP is requested. Please direct any questions concerning this submittal to D. E. McCloud, WBN Site Licensing, at (615) 365-8650.

Revised 12/5/91 [illegible]

Very truly yours,

TENNESSEE VALLEY AUTHORITY

[illegible]

Manager, Nuclear Licensing
and Regulatory Affairs

Enclosures
cc: See page 2

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JUN 29 1989

U.S. Nuclear Regulatory Commission

cc (Enclosures):
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Comment 3: System logic diagrams, i.e., 611 series prints, are presently not within the scope of the configuration control activity of the DBVP. What is the rationale for their absence?

TVA Response:

TVA has decided to incorporate system logic diagrams within the scope of the configuration control activity. This addition is reflected in revision 2 of the DBVP CAP (see enclosure 1).

Comment 4: What will be included in the Preoperational Testing and Prestart Test Program? Current staff position is that no credit will be allowed for any system preoperation test. A preoperational test on a component level may be acceptable.

TVA Response:

The scope of the Watts Bar testing program is the subject of the Prestart Test Program CAP and is not within the scope of the DBVP. Refer to the Prestart Test Program CAP submitted by letter dated December 30, 1988 (L44 881230 800), for a description of what is included in the Preoperational and Prestart Test Program. This CAP was presented to NRC, and NRC comments were addressed during a meeting held on April 18, 1989. A revision to the CAP, based on NRC comments during the meeting, will be submitted by June 30, 1989.

ENCLOSURE 2

TVA Response to NRC Comments Regarding the Design Baseline and Verification Program (DBVP) Corrective Action Program (CAP) Plan Presentation on February 8, 1989

Comment 1: How are commitments controlled with respect to revisions to referenced criteria, e.g., G-29, and how the plant features comply?

TVA Response:

The DBVP licensing verification (LV) activity will verify that commitments to NRC contained in the designated source documents have been captured in the appropriate highest level controlling document. This effort will ensure that current commitments are captured in the current controlling documents. These controlling documents could include procedures, criteria, technical specifications, etc. The Licensing Document Commitment Matrix (LDCM) is being established as a tool for maintaining consistency between licensing commitments and the associated implementing documents.

The LV effort will not verify the implementation of commitments in the final design or construction. The WBN vertical slice review was conducted to provide additional assurance that the WBN design and construction meet licensing commitments.

Previous correspondence regarding G-Specs have been related to NRC Inspection Report Numbers 50-390/86-14 and 50-391/86-14, notice of violation 391/86-14-03. The revised TVA response to notice of violation 391/86-14-03 was submitted to NRC via letter dated September 7, 1988 (L44 880907 803). A supplemental response to this notice of violation was submitted to NRC via letter dated April 7, 1989 (L44 890407 801), to address the use of locking devices for pipe support designs.

Comment 2: The DBVP CAP referenced FSAR section 17.2.1, but this section of the FSAR currently refers to the QA Topical Report. Evaluate this apparent discrepancy and correct the DBVP CAP (as necessary) to refer to the current reference.

TVA Response:

TVA has evaluated NRC's comment and has verified that FSAR section 17.2.1 is the correct reference (refer to FSAR page 17.2-1). However, although no revision to the DBVP CAP is necessary, revision 2 of the DBVP incorporates the definition of primary and secondary safety functions consistent with FSAR section 17.2.1.

ENCLOSURE 3

LIST OF COMMITMENTS

For the Watts Bar Nuclear Plant (WBN), TVA commits to:

- Perform the Design Baseline Verification Program which has the following major components: licensing verification, design basis, calculations, configuration control, and testing requirements.

ENCLOSURE 1

WATTS BAR NUCLEAR PLANT

DESIGN BASELINE AND VERIFICATION PROGRAM (DBVP)

CORRECTIVE ACTION PROGRAM PLAN

REVISION 2