



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

OCT 13 0 1990

Docket Nos. 50-390  
and 50-391

Mr. Oliver D. Kingsley, Jr.  
Senior Vice President, Nuclear Power  
Tennessee Valley Authority  
6N 38A Lookout Place  
1101 Market Street  
Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: QUALITY ASSURANCE RECORDS FOR WATTS BAR (TAC 71923)

By letter dated September 13, 1990, we expressed a concern that the implementation of the Quality Assurance (QA) Corrective Action Plan (CAP) at Watts Bar may not provide an acceptable Q-list and all records required for licensing. Further, we are concerned that no plan exists for performing a systematic records audit to ensure that the records required by NRC regulations, applicable codes, standards, and TVA commitments will be available for licensing. Finally, we stated the position that all missing records should be reported to the NRC along with TVA's proposed resolution.

During a management meeting at Watts Bar on October 3, 1990, your staff requested clarification about (1) whether TVA must establish a program that will identify every missing or incomplete QA record, and (2) whether each missing or incomplete QA record must be reported to the NRC.

First, NRC regulations (e.g., Appendix B to 10 CFR Part 50) and various codes and standards to which TVA has committed require QA records. TVA must have a program that provides reasonable assurance that the QA records are available. The level of assurance depends on the significance of the record. However, we continue to be concerned that you have not yet performed a systematic audit in the records area. Based on the problems your staff has had in assembling necessary records (e.g., to support the Sargent and Lundy program documented in the November 13, 1989, report), our position remains that such an audit or equivalent program is necessary to provide reasonable assurance that the required documentation is available.

601194

9011080069 901030  
PDR ADUCK 05000390  
A PDC

DF01  
10

m/A-4  
ent

Mr. Oliver D. Kingsley, Jr.

-2-

Second, when missing or incomplete records are identified, TVA should first attempt to correct the incomplete record, or regenerate the missing record (e.g., by repeating the required test that served as the basis for the missing record). If the missing record cannot be regenerated or the incomplete record corrected, it is incumbent upon TVA to inform the NRC, and to propose a solution for dispositioning such records in accordance with QA procedures consistent with the requirements of ANSI N45.2.9 1974.

There are various ways of dealing with such records or classes of records, depending on the safety significance of the record(s), the availability of alternative information, and the formality and significance of the requirement. Some examples are discussed below for clarification, although this list should not be considered exhaustive:

1. If a missing or incomplete record is specifically required by an NRC regulation, then TVA should request an exemption or relief from the regulatory requirement in accordance with the applicable regulations, with appropriate justification.
2. If a missing or incomplete record of any other type provides assurance of the adequacy of a safety-significant aspect of the plant, TVA should provide detailed justification for licensing the plant without the record. This justification may include alternative information that demonstrates the adequacy of the as-built plant despite the missing or incomplete record(s).
3. If a group of less safety significant records (e.g., records required by TVA's procedures, but not specifically required by a formal TVA commitment or an NRC requirement) is missing, TVA could develop a procedure for dispositioning such records as they are found. TVA's documentation of its disposition of such records should be available for NRC review.
4. The isolated incomplete or missing record of lesser safety significance may be dispositioned simply by the assurance gained from the availability of the vast majority of similar records.

In summary, it is essential that TVA provide reasonable assurance that the required QA records are available; and address missing or incomplete records, including criteria for determining the safety significance of the records, and the dispositioning of the records based on that safety significance. If you have additional questions concerning this matter, we recommend that you meet with us to discuss your approach.

Mr. Oliver D. Kingsley

-3-

periodically  
Finally, as missing records are identified, TVA should keep the NRC staff informed of the scope, significance, and proposed disposition of the missing or incomplete records. Ultimately, as TVA nears completion of the QA records activities, a report should be submitted to the NRC describing all of the missing or incomplete records or groups of such records that have been identified. This report should include the basis for licensing Watts Bar without the records and, where appropriate, would include any formal requests for exemptions from or relief to specific NRC requirements or TVA commitments.

Sincerely,

Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation

OFC	: PDII-4/LA	: PDII-4/PM	: PDII-4/DD	: PDII-4/D	: OGC	: DRP/AD/RII
NAME	: MKrebs <i>mk</i>	: PTam <i>PT</i>	: SBlack <i>SB</i>	: FHebdon <i>H</i>	: see attached	: GLainas
DATE	: 10/16/90	: 10/16/90	: 10/24/90	: 10/15/90	: 10/ /90	: 10/17/90

  

OFC	: Tech. Editor <i>Ray Sanders</i>	: DRP-D	: DLPQA/D	: ADP	: NRR:DD	: NRR:D
NAME	: RS	: SVaron <i>S</i>	: JRee <i>J</i>	: JPartlow	: FMiraglia	: TMurley
DATE	: 10/16/90	: 10/16/90	: 10/17/90	: 10/ /90	: 10/ /90	: 10/ /90

*# 2 10/17*  
*w/Comments*

STU ENGINEER HAS  
REVIEWED THIS AND  
HAS NO COMMENTS.  
KE-3 BARR CONCURRED  
FOR REVIEW  
NRC:RII  
BWilson  
10/23/90

OFFICIAL RECORD COPY  
Document Name: QUALITY ASSURANCE

Mr. Oliver D. Kingsley, Jr.

-4-

cc:

Mr. Marvin Runyon, Chairman  
Tennessee Valley Authority  
ET 12A 7A  
400 West Summit Hill Drive  
Knoxville, Tennessee 37902

Mr. Edward G. Wallace  
Manager, Nuclear Licensing  
and Regulatory Affairs  
Tennessee Valley Authority  
5N 157B Lookout Place  
Chattanooga, Tennessee 37402-2801

Mr. John B. Waters, Director  
Tennessee Valley Authority  
ET 12A 9A  
400 West Summit Hill Drive  
Knoxville, Tennessee 37902

Mr. W. F. Willis  
Chief Operating Officer  
ET 12B 16B  
400 West Summit Hill Drive  
Knoxville, Tennessee 37902

General Counsel  
Tennessee Valley Authority  
400 West Summit Hill Drive  
ET 11B 33H  
Knoxville, Tennessee 37902

Mr. Dwight Nunn  
Vice President, Nuclear Engineering  
Tennessee Valley Authority  
6N 38A Lookout Place  
1101 Market Street  
Chattanooga, Tennessee 37902

Dr. Mark O. Medford  
Vice President and Nuclear  
Technical Director  
Tennessee Valley Authority  
6N 38A Lookout Place  
Chattanooga, Tennessee 37402-2801

Tennessee Valley Authority  
Rockville Office  
11921 Rockville Pike  
Suite 402  
Rockville, Maryland 20852

Mr. John H. Garrity, Site Vice President  
Watts Bar Nuclear Plant  
Tennessee Valley Authority  
P. O. Box 800  
Spring City, Tennessee 37381

Mr. R. J. Stevens, Site Licensing Manager  
Watts Bar Nuclear Plant  
Tennessee Valley Authority  
P. O. Box 800  
Spring City, Tennessee 37381

Mr. Richard F. Wilson  
Vice President, New Projects  
Tennessee Valley Authority  
6N 38A Lookout Place  
Chattanooga, Tennessee 37402-2801

Honorable Robert Aikman, County Judge  
Rhea County Courthouse  
Dayton, Tennessee 37321

Honorable Johnny Powell, County Judge  
Meigs County Courthouse, Route 2  
Decatur, Tennessee 37322

Mr. Michael H. Mobley, Director  
Division of Radiological Health  
T.E.R.R.A. Building, 6th Floor  
150 9th Avenue North  
Nashville, Tennessee 37219-5404

Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, N.W.  
Atlanta, Georgia 30323

Senior Resident Inspector  
Watts Bar Nuclear Plant  
U.S. Nuclear Regulatory Commission  
Route 2, Box 700  
Spring City, Tennessee 37381

DISTRIBUTION

Docket File

NRC PDR

Local PDR

S. Varga 14-E-4

G. Lainas 14-H-3

F. Miraglia 12-G-18

T. Murley 12-G-18

J. Partlow 12-G-18

F. Hebdon

S. Black

B. Wilson RII

M. Branch RII

G. Walton RII

H. Livermore RII

M. Krebs

P. Tam

J. Roe 10-H-5

OGC 15-B-18

E. Jordan MNBB-3701

ACRS (10)

WBN Reading

E. McKenna

J. Spraul

B. Wilson, RII

S. Ebnetter, RII