

TENNESSEE VALLEY AUTHORITY

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NOV 07 1990

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

Gentlemen:

In the Matter of the Application of ) Docket Nos. 50-390  
Tennessee Valley Authority ) 50-391

WATTS BAR NUCLEAR PLANT (WBN) - CORRECTIVE ACTION PROGRAM (CAP) PLAN FOR Q-LIST

- References:
1. Letter from TVA to NRC dated July 20, 1990, "Watts Bar Nuclear Plant (WBN) - Quality Assurance List (Q-List) Corrective Action Program (CAP) Plan, Revision 3"
  2. Letter from NRC to TVA dated August 16, 1990, "Watts Bar, Unit 1 - Review of Corrective Action Program on Q-List" (NRC questions on CAP Revision 3 - TAC 63590)
  3. Letter from NRC to TVA dated September 18, 1990, "Inspection of the Watts Bar QA Records and Q-List Corrective Action Programs, NRC Inspection Report Nos. 50-390/90-08 and 50-391/90-08"

The purpose of this letter is to provide additional information regarding the Q-List CAP Plan in response to NRC review questions.

Revision 3 of the Q-List CAP Plan was submitted on July 20, 1990 (Reference 1 above), to formalize changes to the CAP plan. By letter to TVA dated August 16, 1990 (Reference 2 above), NRC requested additional information. Later, on September 18, 1990, NRC issued findings from the Q-List inspection (Reference 3 above) in Inspection Report No. 50-390, 391/90-08. TVA's action to respond to Reference 2 is identified in that report as Unresolved Item No. 50-390, 391/90-08-01.

Enclosure 1 to this letter provides NRC's questions from Reference 2, and TVA's responses to those questions. This information should also provide resolution for NRC Inspection Report Item 50-390, 391/90-08-01.

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Enclosure 2 provides Revision 4 to the Q-List CAP. Revision 4 of the Q-List CAP now limits the scope of maintenance/modification records review to only those records involving components which were upgraded in the new Q-List. Further review of records for components which were not upgraded is not considered warranted since the critical structures, systems, and components (CSSC) list was used prior to the Q-List, and deficiencies have not been identified with the CSSC list. This revision also updates responsible organizations to reflect current department responsibilities for records reviews.

TVA's request to modify the submittal date for this letter was approved by the NRC staff. Commitments are shown in Enclosure 1.

If there are any questions, please telephone P. L. Pace at (615) 365-1824

Very truly yours,

TENNESSEE VALLEY AUTHORITY



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Enclosures

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ENCLOSURE 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
WATTS BAR NUCLEAR PLANT UNIT 1  
REVIEW OF CORRECTIVE ACTION PROGRAM  
ON Q-LIST (TAC 63590)

1. Question:

The TVA letter of July 20, 1990, that submitted Revision 3 of the Q-List Corrective Action Program (CAP) to the NRC actually submits Revision 2 as well. Attachment 2 of the CAP was issued in November 1989, and the signatures and dates on Revision 3 indicate it may have been issued as early as April 1990.

Response:

Revision 2 of the CAP was not submitted to NRC since, at that time, it became apparent that another revision of the CAP was needed. Revision 2 and Revision 3 changes were both made to facilitate NRC review. Although some signatures on Revision 3 were obtained in April, revisions were necessary before submittal which required a second review by the responsible individuals. Final management approval of the submittal was completed in July.

2. Question:

The TVA letter of July 20 states that the ease of determining quality assurance (QA) program applicability of these systems (i.e., systems that perform safety functions in mitigating design basis events) is therefore consistent with their importance to safety. Does this mean that QA program applicability to systems that are quality-related will be more difficult to determine? Briefly describe how these determinations will be made.

Response:

Many quality-related components are itemized. For components which are not itemized, the Q-List user will consult Administrative Instruction (AI)-7.6, "Using the Q-List and Identifying Limited QA Programs," which will be revised to control use of the general quality notes. This instruction will include a flowchart that describes the process to determine quality-related programs for equipment not listed in the itemized portion of the Q-List.

3. Question:

Section 3.0 now indicates that some 300,000 items will not be listed individually in the Q-List but will be covered by notes. Provide an estimate of how many notes will be required to take care of these items. Describe how an individual will know which note applies to a specific item.

Response:

These components are grouped by component type (e.g., hangers, cable, insulation) into nine groups. The Q-List user refers to the note that addresses the component type of interest. For example, for a junction box, the note addressing junction boxes would be used to determine QA program applicability.

4. Question:

Section 4.1.2 now addresses coordination of identifiers. Briefly discuss the coordination of the Q-List and its notes with those within TVA's organizations who will be expected (required?) to use the list.

Response:

Training on the new Q-List and the notes is being given to primary Q-List users. These are the groups that write work authorizing documents. Maintenance, construction engineers, and procurement engineers are being targeted for this training. In discussions with maintenance personnel, the new Q-List has been favorably received since it will be available via computer terminals as well as in hard copy form.

5. Question:

Section 6.0 now states: "Corrective actions for the Q-List will be completed prior to fuel load." Section 4.4 indicates that TVA will "develop procedures to issue a new Q-List that is complete, accurate, and supports the needs of all WBN organizations." Clarify that the "new Q-List" will be issued prior to fuel load, and not just the procedure will be developed.

Response:

The new Q-List Design Change Notice (DCN) has been issued by Nuclear Engineering. Site wide implementation of the Q-list will be complete by February 28, 1991.

6. Question:

Discuss how, if at all, the development of the new Q-List will affect Table 3.2-1 of the Watts Bar Final Safety Analysis Report (FSAR). Will a review be made to ensure there is no incompatibility between the list and the table?

Response:

Table 3.2-1 of the FSAR was used as an input to the new Q-List. No incompatibilities exist between this table and the new Q-List.

7. Question:

In the early 1980 timeframe, the staff asked several questions regarding the scope of the Watts Bar QA program during the operations phase. Specifically, Request for Additional Information (RAI) 260.2 asked about specific items being under QA controls. TVA's response was submitted in FSAR Amendment 47. The response referred to such things as the CSSC list and an April 1981 letter to the NRC. The response to RAI 260.2 should be updated in light of the ongoing Q-List CAP.

Response:

FSAR Question 260.2 will be updated in the next FSAR amendment to reflect Q-List changes in FSAR subsection 17.2-1 resulting from Amendment 57.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT

Q-LIST

CORRECTIVE ACTION PROGRAM CAP

REVISION 4