



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

Mark O. Medford
Vice President, Nuclear Assurance, Licensing and Fuels

MAR 26 1991

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) - REASSESSMENT OF COMMITMENT SCHEDULES

This letter provides notice that previously docketed implementation schedules for various plant commitments and submittals will require reassessment due to the construction stop work order. The list of commitments impacted by this reassessment is tabulated in Enclosure 1. These lists are based on the current scope of the stop work order. NRC will be notified should additional changes to any other schedules occur. Enclosure 2 identifies a revision to the schedule for submittal of a response on Main Steam Line Break analysis.

The establishment of revised schedules for these commitments is contingent upon release of the current stop work order and resolution of activities associated with the quality improvement plan. Revised schedules, for the commitments tabulated in Enclosure 1 and for others impacted by the schedule reassessment, will be submitted to NRC 45 days after resumption of construction. Should firm schedules not exist by this time, a report documenting our progress towards establishment of the schedules will be submitted.

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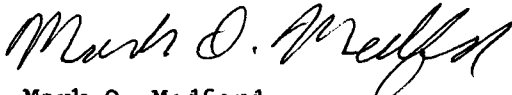
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MAR 26 1991

If there are any questions, please telephone M. C. Bryan at
(615) 365-8819.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


Mark O. Medford

Enclosures

cc (Enclosures):

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NRC Resident Inspector
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ENCLOSURE 1

COMMITMENTS FOR IMPLEMENTATION OF CORRECTIVE ACTIONS

ITEM NO.	DESCRIPTION	CURRENT SCHEDULE
NC0850439003 WBRD 390/85-35	Nonconforming Condition Report WBN 6218 - Reevaluation of Instrument Branch Lines	03/29/91
NC0850439004 WBRD 390/85-35	Nonconforming Condition Report WBN 6218 - Instrument Branch Line Modifications	07/31/91
NC0850474008 WBRD 390/85-43	Nonconforming Condition Report WBN 6278 - Questionable Compression Fittings on Instrument Tubing - Pressure Testing	04/02/91
NC0860057003 WBRD 390/86-14	Nonconforming Condition Report W-333-P and Significant Condition Report WBN 6463-S - Safety-Related Conduit Supports Unique or Bounding Analysis	07/31/91
NC0860057004 WBRD 390/86-14	Nonconforming Condition Report W-333-P and Significant Condition Report WBN 6463-S - Identification By Walkdown of Clamps, Bolts, Spring Nuts, and Slotted Head Screw Deficiencies	07/31/91
NC0860127003 WBRD 390/86-33 WBRD 391/86-30	Non Conforming Condition Reports WBN 6599 & WBN 6581 Requirements For Reduced Tubing Spans With Concentrated Weights - Perform a Design Review To Determine If Additional Supports Will Be Required	05/01/91
NC0860228005 WBRD 390/86-53 WBRD 391/86-51	Significant Condition Report WBN EEB 8642 - Problems with Diesel Generator Relay Contacts - Construction Activities Associated with DCN P-03328 (Removal of K2 and K3 Relays)	01/02/91
NC0870207014 390/87-07-01	Failure To Identify, Evaluate and Disposition Nonconforming Conditions - Complete Field Modifications Required By The HVAC Duct And Support Cap	07/15/91
NC0870207016 390/87-07-01	Failure To Identify, Evaluate and Disposition Nonconforming Conditions - Complete Corrective Actions For The Conduit Support CAP	07/15/91

ENCLOSURE 1

COMMITMENTS FOR IMPLEMENTATION OF CORRECTIVE ACTIONS

ITEM NO.	DESCRIPTION	CURRENT SCHEDULE
NC0870312013 WBRD 390/87-18	Condition Adverse to Quality Report WBP 870833 - Revise Maintenance Instructions to Add Limitorque Design Document Identifying Unique Actuator Parts	06/28/91
NC0870312014 WBRD 390/87-18	Condition Adverse to Quality Report WBP 870833 - Issue Design Information Which Identifies Unique Limitorque Actuator Parts Which Affect Design Function	02/01/91
NC0900001005 WBRD 390/89-11	Condition Adverse to Quality Report WBP 890502 - TVA to Correct Damaged, Loose, or Missing Hardware Deficiencies	09/30/91
NC0900064012 390/89-200 Violation B Example 3	Condition Adverse to Quality Report WBP 890567 - Removal and Replacement of Heat Shrinkable Material on Electrical Containment Penetrations	03/29/91
NC0900064013 390/89-200 Violation B Example 4	Condition Adverse to Quality Report WBN 900214 - Evaluate and Either Provide Technical Justification For or Rework/Replace Deficient Cables	01/02/91
NC0900064016 390/89-200 Violation B Example 4	Condition Adverse to Quality Report WBP 890544 - Resolve Identified Deficiencies With Subject Analyzers	01/28/91
NC0900064017 390/89-200 Violation B Example 1	Condition Adverse to Quality Report WBP 890514 - Undersized Welds On Vendor Components	04/30/91
NC0900158001 WBRD 390/90-02	Condition Adverse to Quality Report WBP 900321 - Lack of Containment Isolation Valves on Instrument Lines - Install Two Normally Closed Manual Valves in Series on Each Test Tee Connection	01/31/91

ENCLOSURE 2

COMMITMENTS FOR RESPONSES TO NRC

ITEM NO.	DESCRIPTION	REVISED SCHEDULE	CURRENT SCHEDULE
NC0840146013	Significant Condition Report	01/31/92	03/01/91
WBRD 390/84-29	WBN NEB 8403 - TVA to Submit		
WBRD 391/84-26	Documentation Demonstrating		
09/26/89 Letter	Applicability of SQN		
	MSLB Analysis Outside		
	Containment		

March 25, 1991

Docket Nos. 50-390
and 50-391

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

Dear Mr. Nauman:

SUBJECT: WATTS BAR NUCLEAR PLANT - REVISED WESTINGHOUSE DROPPED ROD
METHODOLOGY (TAC NO. 77841)

During several management meetings in late 1990, TVA personnel specifically requested the NRC staff to address the subject issue as depicted in FSAR Amendment 63.

We have completed our review of pertinent pages in Amendment 63 and conclude that the methodology used is that described in WCAP-10297-P-A, "Dropped Rod Methodology for Negative Flux Rate Trip Plants." This methodology was approved in June 1983, and is applicable to Watts Bar. Thus, the pages in Amendment 63, Chapter 15, concerning use of the revised Westinghouse Dropped Rod Methodology are acceptable. This completes our efforts on this issue. The review was performed by Ms. M. Chatterton.

Sincerely,

Original signed by

Peter S. Tam, Senior Project Manager
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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H. Livermore RII

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M. Krebs

P. Tam

L. Raghavan

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E. Jordan MNBB-3701

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WB Rdg. File

L. Reyes RII

M. Chatterton 8-E-23

March 21, 1991

Docket Nos. 50-390
and 50-391

Mr. Dan A. Nauman
Senior Vice President, Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
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Dear Mr. Nauman:

SUBJECT: WATTS BAR NUCLEAR PLANT - TMI ITEM II.D.1, "SAFETY AND RELIEF
VALVE TESTING" (TAC NO. 79992)

By letter dated July 22, 1983, TVA responded to the subject NUREG-0737 requirement. We responded to that submittal by an evaluation in Section 3.9.3.3 of SSER 3 (NUREG-0847, Supplement 3), stating that TVA's general approach is acceptable, but that our detailed review was pending. TVA's July 22, 1983 letter indicated that some analyses and modifications were yet to be completed. We need information in areas such as details of the safety and relief valve discharge piping analysis. We would be glad to arrange a conference call between your staff and Mr. G. Hammer, our lead reviewer on this issue.

Please respond within 60 days of receipt of this letter. This request affects fewer than 10 respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by

Peter S. Tam, Senior Project Manager
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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G. Hammer 7-E-23

March 20, 1991

Docket No. 50-390

Mr. Dan A. Nauman
Senior Vice President, Nuclear Group
Tennessee Valley Authority
6N 38 A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Mr. Nauman:

SUBJECT: WATTS BAR UNIT 1 - SITE REVIEW OF THE CAP ON WELDING (TAC 72106)

By this letter, we confirm the planned site review on April 16, 1991, to address issues related to the Corrective Action Program (CAP) on welding. The site review will be performed by Mr. Robert A. Hermann. Specifically, he is interested in the implementation status of this CAP, and the issue of lack of penetration of Class III piping.

We have discussed this planned site review with Mr. Paul Pace of your site licensing staff. We will contact Mr. Pace regarding details of this review.

Sincerely,

Original signed by

Peter S. Tam, Senior Project Manager
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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P. Tam

L. Raghavan

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R. Hermann 7-D-4

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March 20, 1991

Docket No. 50-390

Mr. Dan A. Nauman
Senior Vice President, Nuclear Group
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Dear Mr. Nauman:

SUBJECT: WATTS BAR UNIT 1 - CORRECTIVE ACTION PROGRAM ON QA RECORDS (TAC 71923)

By letter dated January 28, 1991, Mr. Mark O. Medford of your staff submitted a document describing TVA's proposed Additional Systematic Records Review (ASRR). The ASRR is to provide additional confirmation of the adequacy of quality assurance (QA) records for Watts Bar Unit 1.

Following our review of the proposed ASRR, we developed a number of comments which we discussed with your staff in a telephone conference on March 11, 1991. The conference did not change our comments (which are documented in the enclosure to this letter) and we have included an additional comment (No. 13) as a result of the conference.

Please respond within 45 days of receipt of this letter. This requirement affects fewer than 10 respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by

Peter S. Tam, Senior Project Manager
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:

As stated

cc w/enclosure:

See next page

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WBN Reading File

1. The third paragraph of the cover letter refers to adjusting population acceptance criteria to reflect the significance of various types of records. This concept is reflected in the table on page 7 of the ASRR document, and we have the following concerns with the table:
 - a) The table shows 3 record categories: 1) Required by regulation, 2) Permanent, and 3) Non-permanent. We believe that the 209 record categories in ANSI/ASME Standard N45.2.9 are "required by regulation," whether they are permanent or non-permanent. The applicable regulation, Appendix B of 10 CFR 50, states: "Sufficient records shall be maintained to furnish evidence of activities affecting quality." It then goes on to give examples: "The records shall include at least (underline added) the following: Operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analysis. The records shall also include closely related data such as qualifications of personnel, procedures, and equipment." We should know specifically which, if any, of the 209 record categories in N45.2.9 are considered by TVA as not being "required by regulation."
 - b) Section 2.2.2 of N45.2.9 states that non-permanent records are required to show evidence that an activity was performed in accordance with the applicable requirements but need not be retained for the life of the item. Further, the retention period for records generated prior to commercial operation does not begin until the date of commercial operation. At the time of licensing, many of the non-permanent records are as important to the licensing process as are permanent records. To specify a more liberal acceptance criterion for non-permanent records, prior to licensing, may not be in the best interest of the ASRR.
 - c) We believe the acceptance criteria should be specified for 1) primary type deficiencies and for 2) primary plus secondary type deficiencies. For example, we do not think that it should be acceptable for a non-permanent record type to be considered acceptable with 3 primary and 5 secondary deficiencies in a sample of 60 as the table now indicates.

Based on the above, we suggest that an acceptable alternative to the table on page 7 of the ASRR would be to establish the following acceptance criteria (95% confidence) for each of the 209 record categories in N45.2.9:

<u>Deficiency Type</u>	<u>Acceptance Criteria</u>
Primary	5%
Primary plus Secondary	10%

We note that the staff found acceptable, for the Quality of Construction Reinspection/Document Review of Comanche Peak, the conclusion "that a 95/5 sample plan, when used in the context of homogenous populations of attributes, would provide a reasonable screen to detect programmatic or systematic deficiencies."

2. Page 1 of the ASRR document states that the 1987 QA records survey of approximately 4500 records "verified the attributes of the QA records necessary to substantiate the quality of ... activities" We believe the quoted words could be interpreted (wrongly) to mean that the survey revealed no problems. We understand a number of CAQs resulted from this survey, and the statement should be clarified.
3. The discussion of the currency of records reviewed (p.4 of the ASRR) is, in general, very good. However, for cases where a CAP record exists, it should be made clear that previous records of attributes not covered by the CAP will be considered in the ASRR.
4. The sample selection method described on page 5 of the ASRR document presumes 60 samples will be selected from a relatively large population. If a given population is less than 60, the ASRR document should clarify whether the sample size will equal the population size and describe the acceptance criteria.
5. There appears to be a conflict between the "approach of reviewing current configuration" (ASRR p.4) and reviewing "all TVA records" for each selected component (ASRR p.5). This should be resolved.
6. The sample review process described on page 6 of the ASRR document indicates that, once a sample has been selected, the records supporting the current configuration will be retrieved. It is not clear how TVA will ensure that the records reviewed will include all CAP records.
7. It appears that some of the examples of secondary deficiencies listed on page 6 of the ASRR document could easily be considered to be primary deficiencies. For example, an illegible record could be no better than "Results blank." Similarly, a wrong component identifier could invalidate a record such that it is no better than a "Record missing." There should be a means described to recognize and evaluate such deficiencies.
8. Section 3 of the ASRR document differentiates between primary and secondary hardware deficiencies on the basis of their design significance. Consistent with this, page 1 of Figure 3 of the ASRR document uses safety significance of records and design significance of hardware. The term "design significance" needs to be defined and its relationship to safety and "safety significance" should be clarified.
9. As discussed in 1.c. above, we believe the hardware acceptance criteria of 10% for secondary deficiencies (p.9 of the ASRR document) should be for the combination of primary plus secondary deficiencies.
10. Most of the ASRR document speaks of "plant elements" and "record types" such that these terms are relatively clear. Page 9 of the ASRR document, under "Hardware Population Acceptance Criteria," uses the term "element type." The meaning of "element type" is unclear.

- 11. The example of trend analysis at the bottom of page 10 of the ASRR document should be continued to illustrate how the "weighted average technique" will be utilized for some assumed deficiency rates.
12. Page 1 of Figure 3 differentiates deficiencies as substantive or administrative. It is not clear whether this differentiation is the same as primary and secondary in the text.
13. Please describe the statistical sampling plan used to establish the confidence levels.