PROJECT PLAN
for

PROGRAM FOR ASSURANCE OF COMPLETION AND ASSURANCE OF QUALITY

for the
Watts Bar Nuclear Power Plant

CYGNA PROJECT NO. 91854

Prepared for
TENNESSEE VALLEY AUTHORITY

by
CYGNA ENERGY SERVICES
5600 Glenridge Drive, Suite 380
Atlanta, Georgia 30342

PREPARED BY:

R C Killough Date 04/10/92

APPROVED BY:

Date 4/10/92
T. H. Cloninger
CYGNA Project Manager

R C Killough Date 04/10/92
T. L. Pehl (by direction, administrative changes only)
Director, CYGNA Quality Assurance

Date 4/10/92
A. P. Capozzi
TVA Project Manager

Program for Assurance of Completion and Assurance of Quality
CYGNA Project No. 91854

Project Plan
REVISION HISTORY

REASON FOR REVISION: Original issue				
REVISION No. 0	PREPARED BY	PROJECT MANAGER	QUALITY ASSURANCE	TVA PROJECT MANAGER
	William Peavyhouse DATE: 03/01/91	Ted Cloninger DATE: 03/01/91	Scott Gunderson DATE: 03/01/91	N/A DATE:
REASON FOR REVISION: Reflect Prototype System Review; Incorporate TVA Comments				
REVISION No. 1	PREPARED BY	PROJECT MANAGER	QUALITY ASSURANCE	TVA PROJECT MANAGER
	William Peavyhouse DATE: 04/12/91	Ted Cloninger DATE: 04/12/91	Scott Gunderson DATE: 04/12/91	A.P. Capozzi DATE: 04/12/91
REASON FOR REVISION: Incorporate lessons learned from Prototype Phase and modify organization, scope and summary				
REVISION No. 2	PREPARED BY	PROJECT MANAGER	QUALITY ASSURANCE	TVA PROJECT MANAGER
	R.C. Killough DATE: 10/29/91	T.H. Cloninger DATE: 10/29/91	Tom Pehl DATE: 10/30/91	A.P. Capozzi DATE: 11/04/91
REASON FOR REVISION: Administrative changes only.				
REVISION No. 3	PREPARED BY	PROJECT MANAGER	QUALITY ASSURANCE	TVA PROJECT MANAGER
	RC Killough DATE: 04/10/92	DATE: 4-10-92	RC Killough admin change only DATE: 4/10/92	DATE: 4/10/92
REASON FOR REVISION:				
REVISION No.	PREPARED BY	PROJECT MANAGER	QUALITY ASSURANCE	TVA PROJECT MANAGER
	DATE:	DATE:	DATE:	DATE:
REASON FOR REVISION:				
REVISION No.	PREPARED BY	PROJECT MANAGER	QUALITY ASSURANCE	TVA PROJECT MANAGER
	DATE:	DATE:	DATE:	DATE:

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1.0 PROJECT PLAN SUMMARY

This Project Plan summarizes the approach, methods and review techniques to be utilized for the PAC/AQ (Program for Assurance of Completion and Assurance of Quality) review for the Watts Bar Nuclear Power Plant.

The Program for Assurance of Completion and Assurance of Quality consists of two major segments with multiple phases in each segment. These two segments are:

I. PAC/AQ Plant Wide

II. PAC/AQ System Review Prototype

The PAC/AQ Plant Wide Segment consists of five phases and is designed to assure the following:

- Plant commitments and design are known.
- The plant is constructed as designed.
- Material conditions are satisfactory.
- Potential new issues or problems are identified and resolved.
- Corrective actions defined are implemented.
- Implemented corrective actions address the identified problems in a complete manner.
- Operational readiness is achieved.

The five phases are summarized as follows:

Phase I	Ensures that the plant commitments are defined.
Phase II	Ensures that implementation documentation exists to verify specific plant commitments.
Phase III	Ensures that the implementation documentation provides sufficient objective evidence and covers the commitments.
Phase IV	Ensures that the implementing documents are being implemented properly through a Vertical Slice Review of a selected number of plant systems or technical issues.

Phase V Ensures that the integration of engineering and construction completion activities do not invalidate design/licensing basis through oversight of the Operational Readiness Review (ORR) Program.

This plan describes these programs as they are currently envisioned. As the project continues and more detail becomes available on the actual methods of implementation, the plan may be revised.

The PAC/AQ System Review Prototype Segment was similar to the Plant Wide effort but was limited to exercising the review process through the first four phases for the Essential Raw Cooling Water System (ERCW). This segment of the overall program was undertaken in an expedited manner to ensure the soundness of the program prior to commencement of the Plant Wide effort, as well as to gain early insight on plant status.

A logical methodology was developed to ensure that the prototype system selected was representative of the plant condition and provided the broadest possible basis for testing PAC/AQ. This included consideration of:

- Extent of construction processes
- Safety significance of system
- System complexity in terms of interfaces with other systems, amount and type of equipment (hence attributes) and extent of various design analysis used
- Multiple operational modes
- Extent of construction completion and extent to which the system is representative of the plant as a whole.

This methodology was documented in Engineering Report Number ER-91854-01, "Selection of the Watts Bar Nuclear Plant System for the PAC/AQ Prototype Program Review".

The overall strategy of the entire project is to perform an in-depth review to provide reasonable assurance that commitments are met. The strategy employs a combination of a 100% review of commitments and selected verification of commitment implementation. It is an objective of the program to have the results serve as the basis for the 10CFR 50.54f certification package.

A major element of both the plant wide and prototype PAC/AQ effort is close interface with appropriate TVA organizations through the prime involvement of the WBN TVA PAC/AQ Project Manager. During all phases of each program, non-conformances, areas of concern or specific recommendations will be identified and tracked to closure. The project methodology providing directions on how these items should be dispositioned will be controlled via an appropriate Project Instruction.

Prior to initiation of the PAC/AQ Program, a "Program Team" had been established to act as an advisory body to various Watts Bar line organizations. The Program Team also reviewed various corrective action programs. At the time of the initiation of PAC/AQ, the Program Team was completing its efforts. The Team's final report will be used as input to the PAC/AQ process and any relevant issues or recommendations contained in the report will be addressed by PAC/AQ.

2.0 DESCRIPTION OF PROJECT PHASES

The Watts Bar PAC/AQ effort consists of five major phases.

2.1 PHASE I: Compile WBN Commitments and Design Elements

Phase I consists of three tasks:

- Commitment Identification and Collection
- Design Element Identification
- Matching of Commitments and Design Features

The steps associated with each of these tasks are shown in Figure 2.1, organized as they will be accomplished and integrated with one another.

The methodology proposed entails first defining the plant commitments made in the FSAR and other licensing and technical documents (such as IE Bulletins, NRC Notices/Inspections, Regulatory Guides, etc.). The review will utilize commitment sources located in the License Document Commitment Matrix (LDCM), Tracking and Reporting of Open Items (TROI) and the Final Safety Analysis Report (FSAR). In particular, implementing documents for these commitments will be evaluated in-depth in Phases III and IV. These documents provide much of the objective evidence that commitments have been met and that the plant is properly designed and constructed as intended.

The methodology for identification of commitments includes first identifying pertinent information about each commitment and, later, evaluating the implementing documents for them.

This information will be used for the following reasons:

- Tracking and retrieval of commitments
- Clear understanding of commitment
- Significance of commitment in criteria, specifications, evaluations, etc.
- Categorization of commitment type
- Current commitment status
- Systems, components, equipment affected by commitment

The License Document Commitment Matrix (LDCM), Tracking and Reporting of Open Items (TROI) and the Final Safety Analysis Report (FSAR) will serve as the primary sources for identifying data and pertinent information concerning commitments at Watts Bar Nuclear Plant. The scope of commitment identification will be limited to those identified

in docketed correspondence up to November 18, 1991 and the FSAR, Amendment 68. All commitments identified subsequent to November 18, 1991 and FSAR, Amendment 68 will be tracked and dispositioned under normal WBN Licensing staff controls and procedures. This will encompass the original scope of the LDCM with the following exclusion: The draft fuel load license and Technical Specifications were excluded due to the broad changes which have occurred since the drafts were first developed.

3

In using LDCM, TROI and the FSAR, hardcopy text will be reviewed to identify the commitment. In order to confirm completeness of the identified docketed correspondence within the utilized databases and the void period discussed above, a statistical sample of Public Document Room Correspondence will be verified as contained in the PAC/AQ scope. If the statistical sample is found to be acceptable, the identified commitments will be declared acceptable for use in PAC/AQ. Otherwise alternate sources will be determined. The method of selecting alternate sources will consider trends in the results of the assessment (i.e. particular type of commitment information or particular time period).

The execution of the Phase I portion of the Prototype System Review Program was undertaken fundamentally in accordance with the plant wide Program. However, guidance was developed to extract from the total plant commitment sources only those that apply to the selected prototype system. Other aspects of the Phase I prototype process mirrored the Plant Wide Program such as commitment classification, data collection etc. Figure 2.2 depicts how the Prototype process was modified.

Figure 2.1

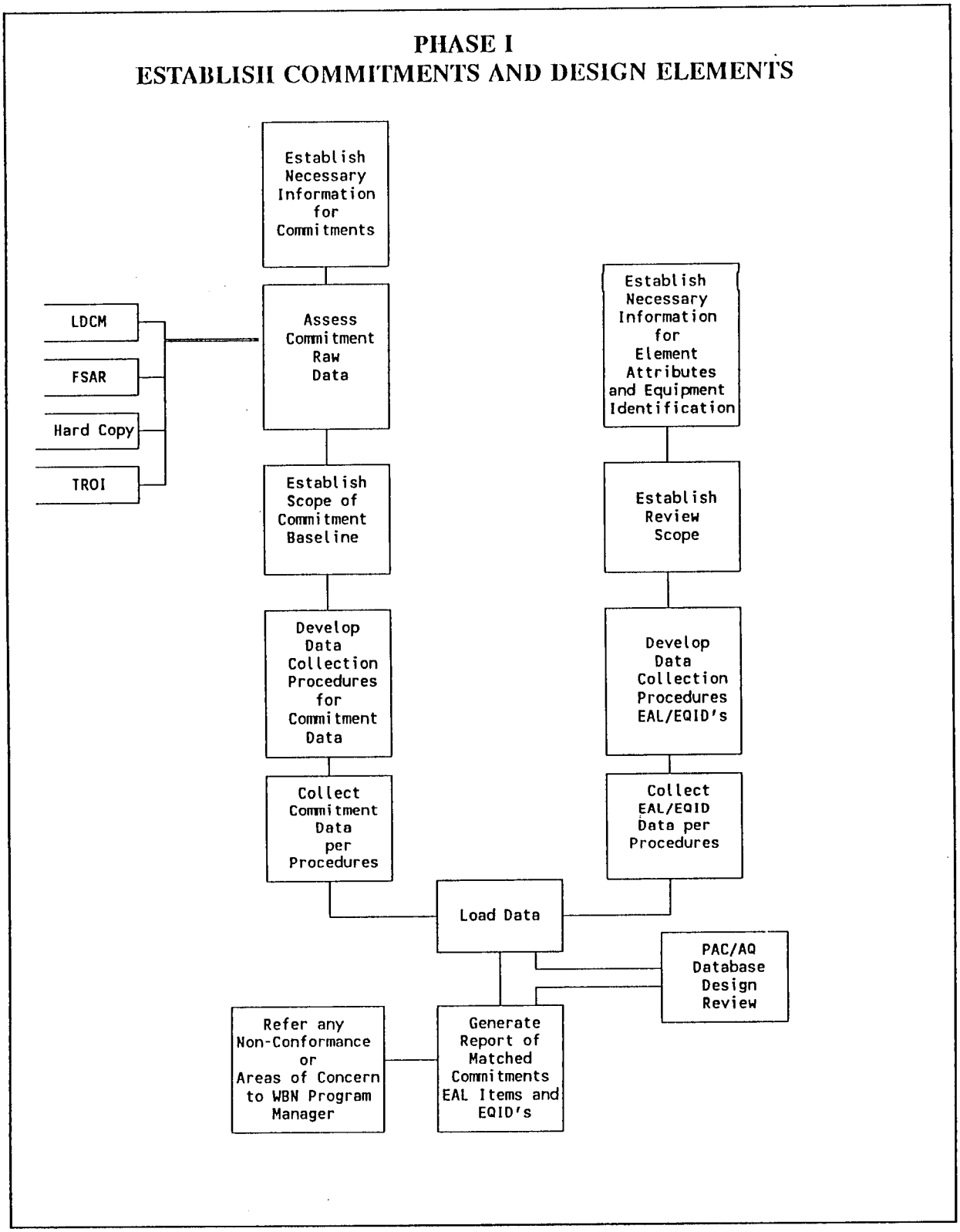
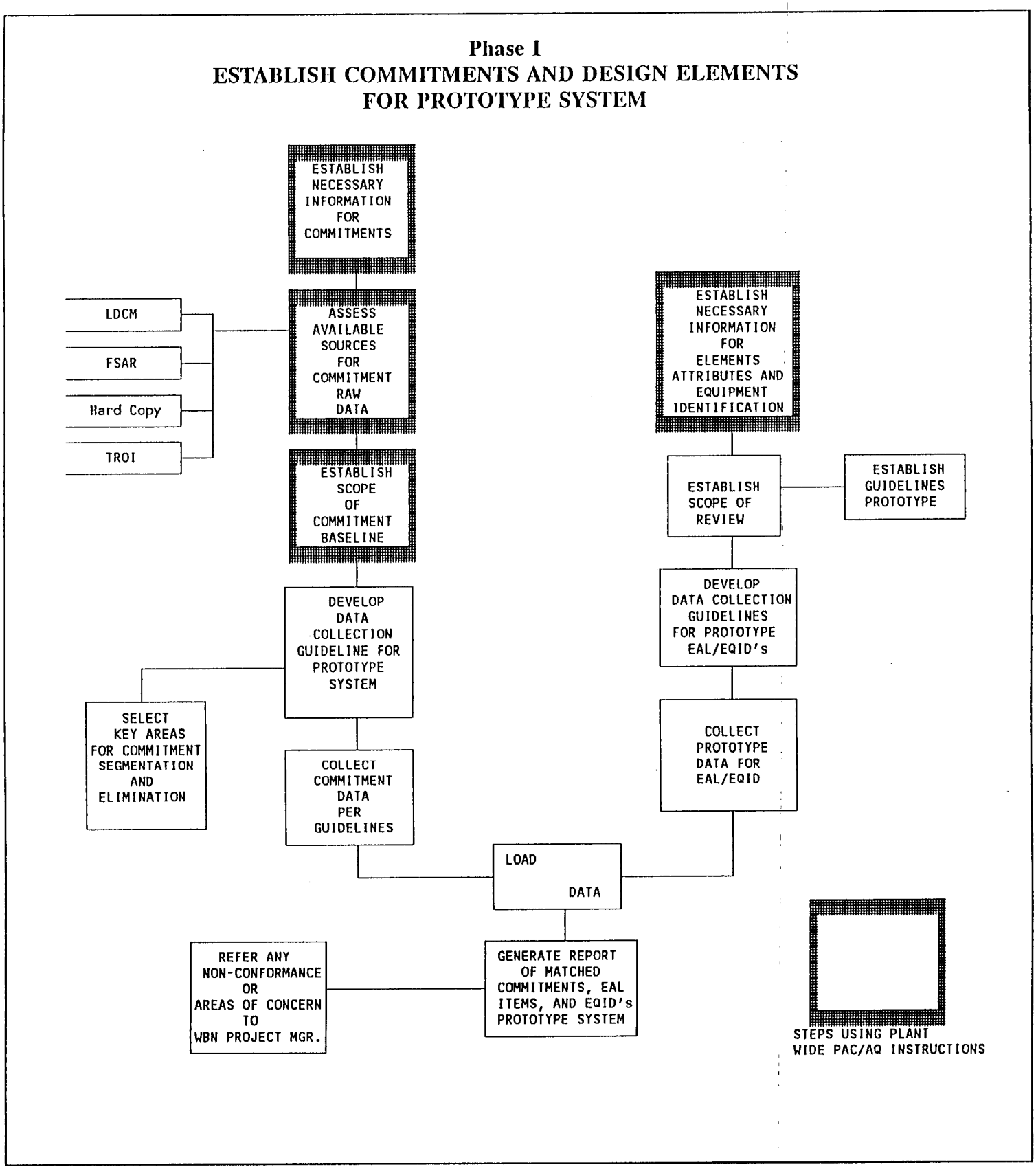

PHASE I
ESTABLISH COMMITMENTS AND DESIGN ELEMENTS
Establish Necessary Information for Commitments
LDCM
FSAR
Hard Copy
TROI
Assess Commitment Raw Data
Establish Scope of Commitment Baseline
Develop Data Collection Procedures for Commitment Data
Collect Commitment Data per Procedures
Establish Necessary Information for Element Attributes and Equipment Identification
Establish Review Scope
Develop Data Collection Procedures EAL/EQID's
Collect EAL/EQID Data per Procedures
Load Data
PAC/AQ Database Design Review
Refer any Non-Conformance or Areas of Concern to WBN Program Manager
Generate Report of Matched Commitments EAL Items and EQID's

Figure 2.2


Phase I
ESTABLISH COMMITMENTS AND DESIGN ELEMENTS
FOR PROTOTYPE SYSTEM
ESTABLISH NECESSARY INFORMATION FOR COMMITMENTS
LDCM
FSAR
Hard Copy
TROI
ASSESS AVAILABLE SOURCES FOR COMMITMENT RAW DATA
ESTABLISH SCOPE OF COMMITMENT BASELINE
DEVELOP DATA COLLECTION GUIDELINE FOR PROTOTYPE SYSTEM
SELECT KEY AREAS FOR COMMITMENT SEGMENTATION AND ELIMINATION
COLLECT COMMITMENT DATA PER GUIDELINES
ESTABLISH NECESSARY INFORMATION FOR ELEMENTS ATTRIBUTES AND EQUIPMENT IDENTIFICATION
ESTABLISH SCOPE OF REVIEW
ESTABLISH GUIDELINES PROTOTYPE
DEVELOP DATA COLLECTION GUIDELINES FOR PROTOTYPE EAL/EQID's
COLLECT PROTOTYPE DATA FOR EAL/EQID
LOAD DATA
GENERATE REPORT OF MATCHED COMMITMENTS, EAL ITEMS, AND EQID's PROTOTYPE SYSTEM
REFER ANY NON-CONFORMANCE OR AREAS OF CONCERN TO WBN PROJECT MGR.
STEPS USING PLANT WIDE PAC/AQ INSTRUCTIONS

Commitment information and data collection can now proceed. Commitments made by WBN will be identified using the following definition for a commitment.

> *"An action statement provided to a regulatory agency by TVA (or a submittal from the regulatory agency to TVA without a further response) to perform, conduct, comply with, or execute a specific task, requirement, test, or operation."*

Commitments will be identified as one of five types:

1. Federal Regulation or Regulatory Standard (e.g. Regulatory Guides, Standard Review Plan, etc.). A commitment that is made to respond to or comply with the requirements of a federal regulation or other guidance documents. | 4

2. Design Basis. A commitment that is made to define the design baseline of the nuclear facility.

3. Operational and Administrative. A commitment that is made to provide guidance or define methods and procedures for plant operations or to provide information, respond to questions via correspondence.

4. Special Corrective Action. A commitment stating the intention to complete action(s) in response to an NRC request, inspection report or deficiency. | 4

5. Statement of Compliance. A statement made to indicate that actions have been completed to comply with a previously stated commitment or a statement of fact regarding past completed actions.

It should be noted that these commitment types and their definition have been developed strictly for use in and to meet the needs of the defined scope of PAC/AQ and may extend beyond those commitments which serve as part of the licensing basis for the plant. | 4

Guidance on identifying a potential commitment with the aid of the above definition and categorization is provided in the Project Instructions. This guidance will also include identification of "Non Commitments".

Commitments will also be classified as follows:

1. **Ongoing** - Commitments which are satisfied through design or periodic programmatic actions throughout the operating life of the plant.

2. **One Time** - Commitments which are satisfied through single actions which need not be repeated. These actions are usually tied to a specific date or plant milestone.

3. **Superseded** - Commitments which have been rendered null and void either by more recent overriding commitments or by subsequent changes to plant design and/or configuration.

4. **Limited Applicability** - Commitments which do not have current or future applicability to WBN and do not directly affect the licensing or design basis of the plant.

In addition to these four classifications, any commitments which are deemed to be unnecessary, redundant or overly conservative and having a potentially adverse impact on future plant operation will be identified by the responsible engineer and reviewed by CYGNA Project Management. If the Project Manager agrees with the responsible engineer, the recommendation for deletion of the commitment with justification will be made to the TVA Project Manager.

Once the commitments have been identified, the data items required for each will be entered on a data form for inclusion in the PAC/AQ database.

The next task is to compile the PAC/AQ Element Attributes List (EAL). The attributes will be obtained largely from the WBN EAL, as it is a relatively complete listing of plant design elements and attributes. The specific type of attribute will also be obtained from this listing by the reviewer as he/she identifies it as a Design, Construction, or QA/QC type of attribute. The reviewer will also classify the attribute as applicable or non-applicable, and it is this step which will lead to the final listing of attributes that PAC/AQ will deal with. Dependent upon the attribute type, a reference document will be called out (i.e., design criteria, TI, WP) for use in the implementing document identification and evaluation process.

Next, the scope of plant equipment data will be determined through a sort of the Q list. The Q list will be sorted by QA status, safety classification, 1E, seismic classification, and environmental qualification to provide the scope of systems, structures and components for utilization in the PAC/AQ project.

The third task is to associate the PAC/AQ Commitments to each specific design feature of each Q-List component. Items listed as commitment units in the LDCM which do not represent valid commitments per the PAC/AQ definition, will be identified and recommended for deletion in Phase II.

For the Prototype Program the above methodology was modified by guidance to reviewers in selecting design elements and associated equipment pertinent to the prototype system. However data collection largely followed the methods for the Plant Wide PAC/AQ Program.

The principal goal of Phase I is to establish a list of the commitments/design features at the lowest practical equipment level. For the Plant Wide Phase I effort such a list will encompass the overall plant. For the prototype effort, the listing encompassed those commitments/design features of the ERCW system.

While generating the match of commitments to design requirements areas of concern and recommendations may be identified. A mechanism to notify TVA of these areas will be developed. This mechanism will include:

- Identifying the area of concern/recommendation to TVA Project Manager and recommending a resolution
- TVA proposing corrective action or resolution
- PAC/AQ concurrence of corrective action or resolution
- TVA Nuclear Quality Assurance verification of the completion of corrective action or resolution and inform PAC/AQ.

Additionally a tracking system will be used to ensure that the concerns are addressed and tracked to closure. This tracking system will be identified as the Potential Area of Concern/Recommendation (PACR) process. 3

The Phase I deliverable consists of a compilation in data base format of the Watts Bar Nuclear Power Plant commitments and design features. The deliverable will provide a summary of the commitment, source document reference, applicable system and equipment identification and cross-reference to existing Watts Bar Nuclear Power Plant tracking system.

2.2 PHASE II - Confirm Specific Design Elements/Commitments Are Implemented

Phase II of the work scope consists of determining how the defined commitments are implemented by both in-line programs and uniquely defined programs. Each commitment identified in Phase I will be matched to its implementing document. Any commitments without a defined closure program will be identified, investigated and resolved. Where commitments exist but are not addressed by a implementing document, the appropriate closure document will be recommended. These recommendations will then be referred to the TVA WBN Project Manager for action as described previously.

The primary objective of this phase is to confirm that an implementing document exists that addresses each commitment, and to make an initial assessment as to whether the document can provide sufficient objective evidence to support that the commitment is in fact implemented. Where there are apparent limitations to the commitment closure path, the limitation will be documented and used as input to develop the Technical Review Plans in Phases III and IV.

The fundamental tasks performed in Phase II are common between the Plant Wide and Prototype Programs. Obviously the commitments being tracked to implementing documents for the Prototype effort was limited to those identified in Phase I for the selected system.

The Phase II deliverables consists of the Phase I deliverable with cross-reference to unique or in-line implementing document(s) that assure the base commitment is met. The deliverable will provide a specific reference to the Watts Bar Nuclear Power Plant procedure, test, calculations, etc., which implements the commitment. Commitments classified as on-going will be source noted in the appropriate site implementing document by the responsible organization. Commitments with no implementation reference will be compiled and provided to the TVA Project Manager to ensure resolution and closure. 3

2.3 PHASE III - Confirm Technical Adequacy of Implementing Documents

This phase of the work consists of a thorough review and evaluation of the Implementing Documents that, when completed, assure design requirements and commitments are met. It is a horizontal review with emphasis on the integrity of the process in achieving the desired objective of the program. It is accomplished by verifying that the existing in-line and unique programs provide definitive objective evidence (documentation) that the commitments are met. The implementing techniques utilized (e.g. inspection, analysis or review) will be reviewed in sufficient depth to ensure that any "flaws" in the programs are identified.

The primary focus of Phase III is to confirm that the implementing documents meet their objectives with sufficient depth and independence to furnish valid results. All WBN Corrective Action Programs (CAPs), Special Programs (SPs) and a sample of major work processes will be reviewed to assess their effectiveness. Documentation that does not provide the evidence needed to implement a commitment will be identified and corrective action will be undertaken and tracked to ensure resolution and closure.

The Phase III deliverables consist of a set of assessment reports providing the Implementing Documents reviewed, Technical Review Plans, and the strengths and weaknesses of the evaluated Implementing Document, Corrective Action Program, Special Program or work process in meeting its objectives.

As was the case in Phase II the fundamental tasks performed in Phase III are similar between the Plant Wide and Prototype Programs. However, while reviewing and evaluating implementing documents for the prototype system, issues may be identified which could have generic implications for other plant systems, programs, etc. Such cases will be investigated in depth to determine the generic root cause. Results of the investigation will be provided to the TVA WBN Project Manager for resolution and closure.

2.4 PHASE IV - Confirm *Results* of In-line/Unique Processes

The Phase IV work scope entails a "Vertical Slice Review" of a selected number of plant systems or specific technical issues to ensure that implementing documents have been correctly developed and have been adequately reflected in the plant hardware. Review techniques will include independent inspections of actual hardware installations, calculation verification, test results verification, etc. to confirm that the results of the in-line and unique processes are providing valid results.

Technical Review Plans for performing confirmation will be developed to execute the Phase IV effort. These plans will include review and walkdown considerations that contain both specific review criteria (checklists) and independent system performance guidance. The team will be of an experience level sufficient to determine that results obtained from the document implementation meet the intent of the original commitment. Development of specific review criteria will be based on a set of sampling considerations as follows:

- Historical problems and weaknesses at WBN
- Exclusion areas in previous reviews at WBN
- Sequoyah Nuclear Plant IDI issues applicable to WBN
- High risk issues and industry problems (e.g. App R, EQ, etc.)
- Watts Bar Program Team Closure Report items
- Design Basis requirements
- Employee Concern issues
- Identified Concerns from the PAC/AQ Phases I, II and III

The evaluation of results will ensure that areas of plant design, construction and QA/QC have been addressed through the system reviews and reviews of selected unique programs.

As discussed in the methodology for previous Phases, where areas of concern are identified they will be provided to the WBN Project Manager for resolution and closure.

An example of this phase's activities would be the physical confirmation of the implementation of the WBN Fuse Program. Fuse type (as installed) will be confirmed to

meet the requirements specified by the program. The calculation basis (such as amperage, system transients, breaker configuration, etc.) for fuse requirement will be confirmed as acceptable. The operations and maintenance procedures will be reviewed to confirm that the fuse type, sizing and post installation test requirements have been incorporated. Finally, the implementation of commitments associated with the fuse program will be verified.

The Phase IV deliverables consists of a set of verification reports providing the results of specific areas reviewed, Technical Review Plans, and evaluation of the results. Phase IV reviews will be staged to coincide with the completion of CAP's and SP's, where possible, to provide for overall evaluation of the program results and effectiveness.

2.5 PHASE V - Final Design and Completion Review (Oversight of Operational Readiness Review)

The final phase consists of an independent confirmation that the integration of all completion activities has been accomplished without defeating any design/licensing bases, and that at the system level the key safety systems are ready for operation. These objectives will be accomplished through oversight of the WBN Operational Readiness Review (ORR) Program. This phase applies only to the Plant Wide PAC/AQ Program. The oversight will be provided by senior personnel with experience from sites other than Watts Bar, supplemented, when necessary, by personnel with specific expertise and Industry experience from outside TVA.

PAC/AQ oversight will assess the WBN organization's activities in the performance of the four principal objectives of the ORR:

- Performance objective self-assessment for each site organization
- Completion of commitments, including CAPs and Special Programs
- Completion of System Pre-Operability Checklists (SPOC)
- Performance and readiness for Master Startup Operations/Testing Checklist

The oversight provided by PAC/AQ will be provided throughout the development and implementation of the Watts Bar Operational Readiness Review Program.

At the conclusion of this phase, system completion will have been evaluated from the perspective of system design, material condition, supporting programs and systems and plant modifications. In addition, confirmation that all "high exposure" generic issues are addressed without adversely impacting other design/licensing bases will be achieved.

It is anticipated that certification of completion will be provided by the WBN line management organizations as the project nears the final licensing milestones. The completion of these programs will be interactively integrated with the results of Phase V PAC/AQ activities. PAC/AQ will provide technical input and support to aid WBN line organizations in preparation of the 10CFR50.54f certification package.

2.6 Key Elements of PAC/AQ Versus Each Phase

The matrix in Figure 1 shows how the elements of this program relate to other typical industry PAC programs where the major focus is on design verification. In addition to design verification, this effort includes a review of license commitments and a substantial amount of physical (versus paper) verification and system functionality reviews as indicated on the matrix.

A program schematic is included in Figure 2. Flow charts of the individual phases (Figures 3-7) are also provided. Section 3.0 provides a brief discussion of the methodology for execution of the PAC/AQ Program.

FIGURE 1

PHASES	Typical "PAC"	License Review	Sample Physical Inspection "AQ"	Final Design Review "AQ"
I Define WBN Baseline: Design Elements/License Commitments	Design Element	License Commit-ments		
II Match Baseline Design Elements and License Commitments to Implementation Documentation	Verify Complete	Verify Complete		
III Verify Adequacy of Existing WBN Implementing Documents	Verify Adequacy of Documents	Verify Adequacy of Documents		
IV Confirm Independently the Results of the Implementation Documentation	Verify Results	Verify Results	Physical Inspection Independent Confirma-tion	
V Final Design and Completion Review (Oversight of Operational Readiness Review)			Physical Confirma-tion	Function-ality

FIGURE 2

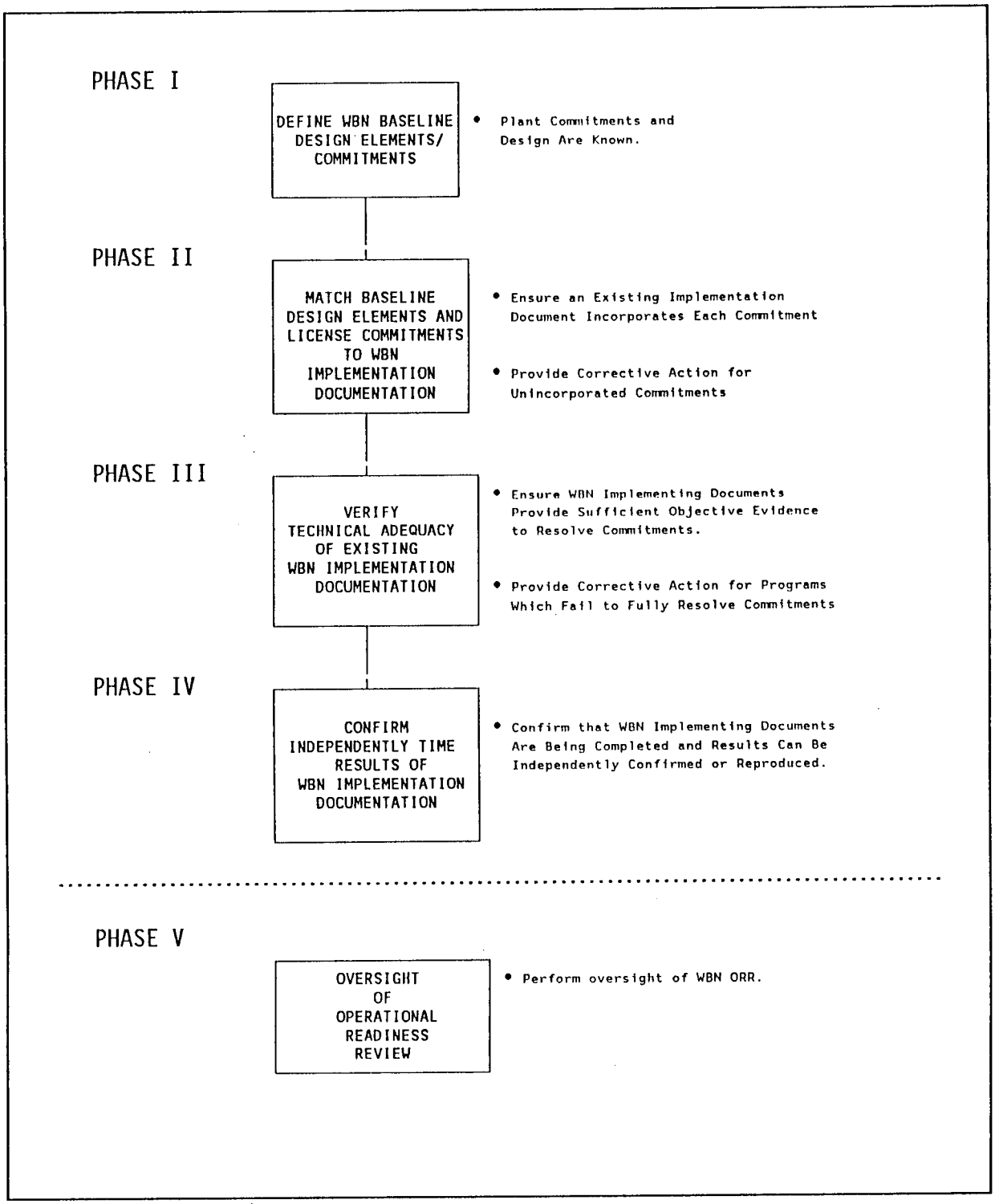

PHASE I
DEFINE WBN BASELINE DESIGN ELEMENTS/ COMMITMENTS
• Plant Commitments and Design Are Known.
PHASE II
MATCH BASELINE DESIGN ELEMENTS AND LICENSE COMMITMENTS TO WBN IMPLEMENTATION DOCUMENTATION
• Ensure an Existing Implementation Document Incorporates Each Commitment
• Provide Corrective Action for Unincorporated Commitments
PHASE III
VERIFY TECHNICAL ADEQUACY OF EXISTING WBN IMPLEMENTATION DOCUMENTATION
• Ensure WBN Implementing Documents Provide Sufficient Objective Evidence to Resolve Commitments.
• Provide Corrective Action for Programs Which Fail to Fully Resolve Commitments
PHASE IV
CONFIRM INDEPENDENTLY TIME RESULTS OF WBN IMPLEMENTATION DOCUMENTATION
• Confirm that WBN Implementing Documents Are Being Completed and Results Can Be Independently Confirmed or Reproduced.
PHASE V
OVERSIGHT OF OPERATIONAL READINESS REVIEW
• Perform oversight of WBN ORR.

FIGURE 3

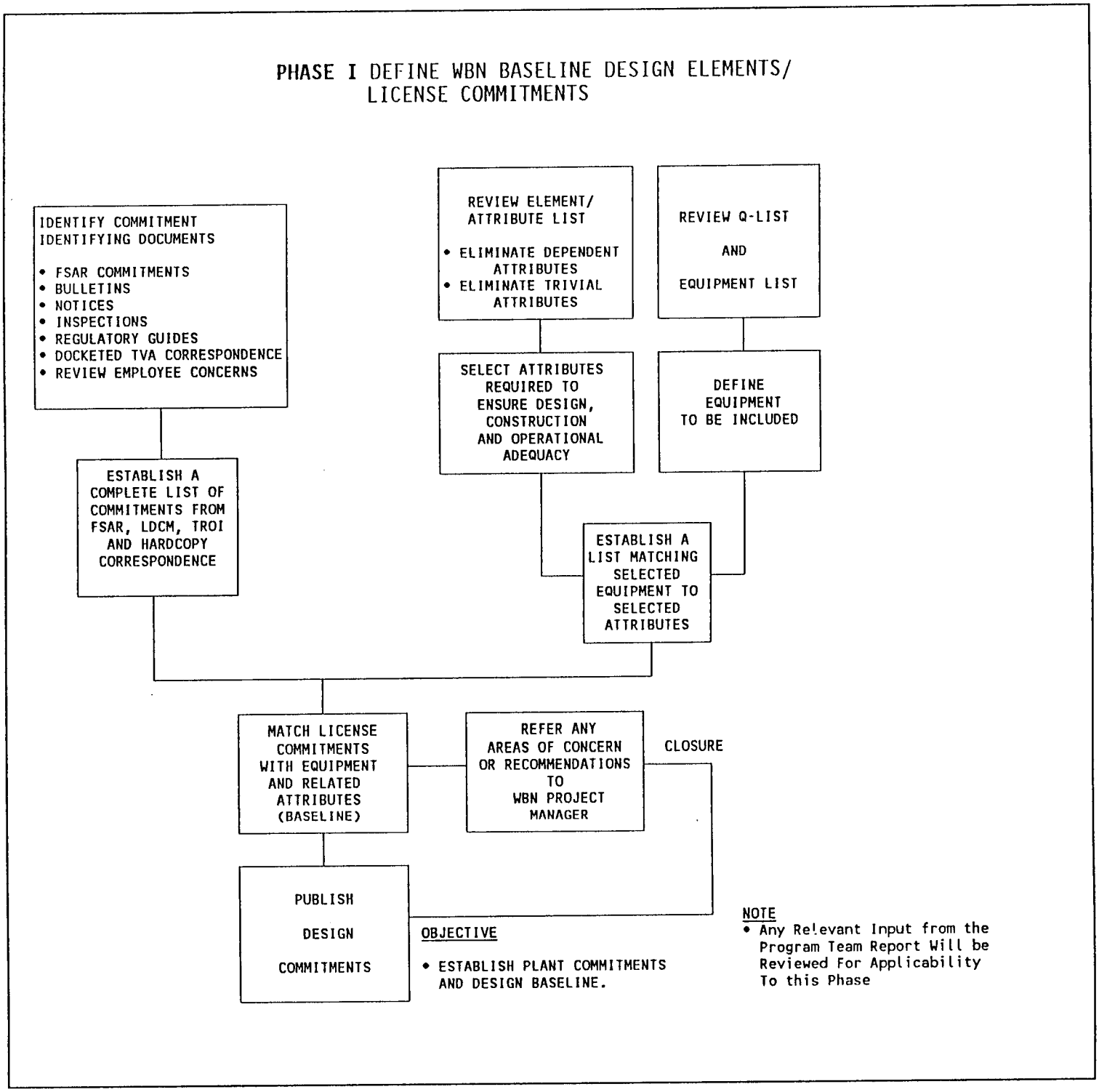
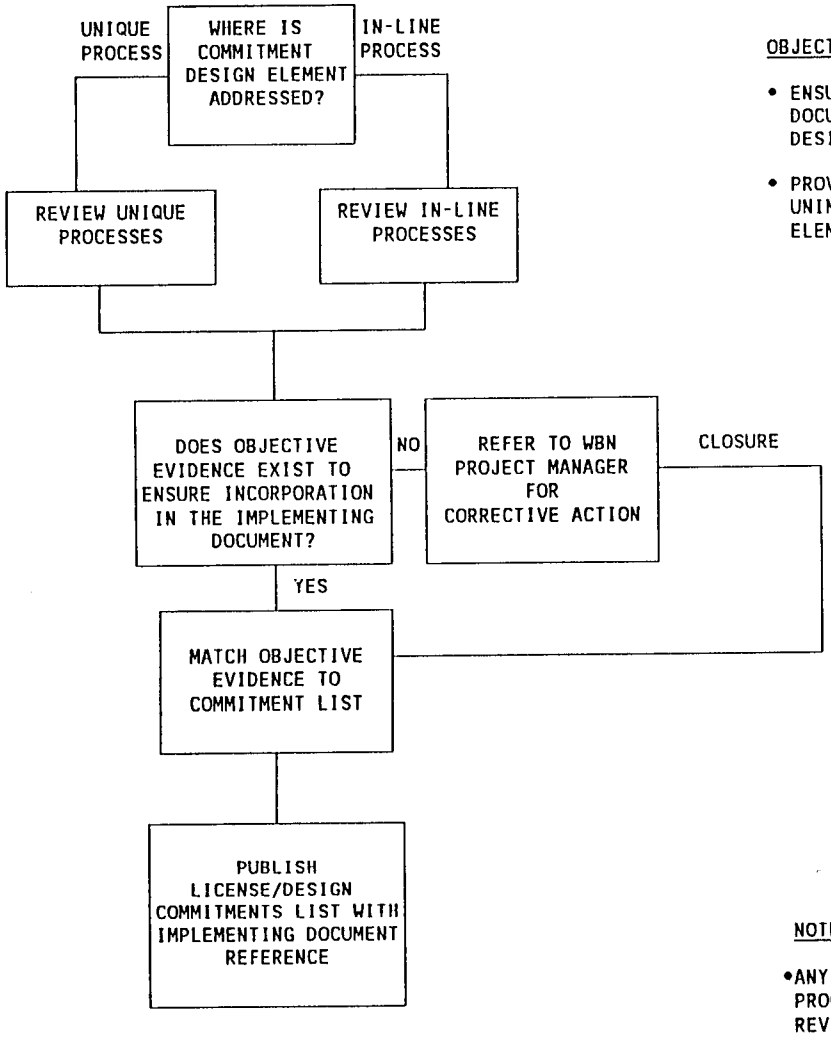

PHASE I DEFINE WBN BASELINE DESIGN ELEMENTS/ LICENSE COMMITMENTS
IDENTIFY COMMITMENT IDENTIFYING DOCUMENTS
• FSAR COMMITMENTS
• BULLETINS
• NOTICES
• INSPECTIONS
• REGULATORY GUIDES
• DOCKETED TVA CORRESPONDENCE
• REVIEW EMPLOYEE CONCERNS
ESTABLISH A COMPLETE LIST OF COMMITMENTS FROM FSAR, LDCM, TROI AND HARDCOPY CORRESPONDENCE
REVIEW ELEMENT/ ATTRIBUTE LIST
• ELIMINATE DEPENDENT ATTRIBUTES
• ELIMINATE TRIVIAL ATTRIBUTES
SELECT ATTRIBUTES REQUIRED TO ENSURE DESIGN, CONSTRUCTION AND OPERATIONAL ADEQUACY
REVIEW Q-LIST AND EQUIPMENT LIST
DEFINE EQUIPMENT TO BE INCLUDED
ESTABLISH A LIST MATCHING SELECTED EQUIPMENT TO SELECTED ATTRIBUTES
MATCH LICENSE COMMITMENTS WITH EQUIPMENT AND RELATED ATTRIBUTES (BASELINE)
REFER ANY AREAS OF CONCERN OR RECOMMENDATIONS TO WBN PROJECT MANAGER
CLOSURE
PUBLISH DESIGN COMMITMENTS
OBJECTIVE
• ESTABLISH PLANT COMMITMENTS AND DESIGN BASELINE.
NOTE
• Any Relevant Input from the Program Team Report Will be Reviewed For Applicability To this Phase

FIGURE 4

PHASE II MATCH BASELINE DESIGN ELEMENTS AND COMMITMENTS TO WBN IMPLEMENTING DOCUMENTS



OBJECTIVES

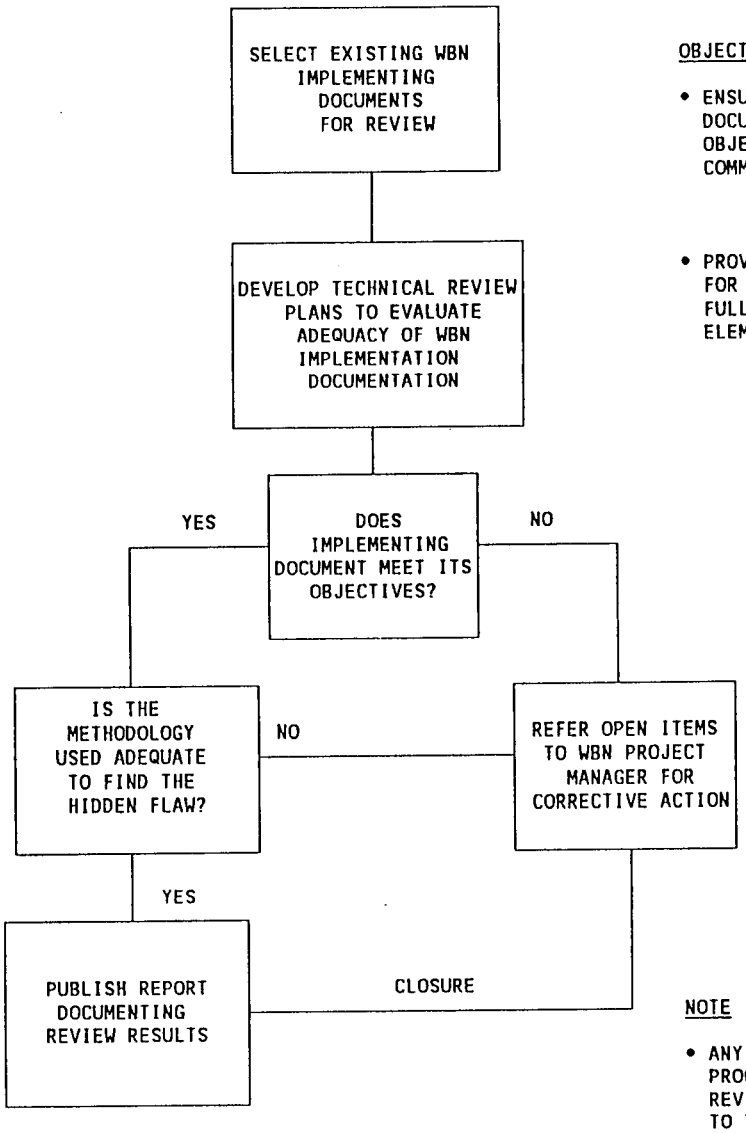
- ENSURE AN EXISTING IMPLEMENTING DOCUMENT INCORPORATES EACH COMMITMENT/ DESIGN ELEMENT.
- PROVIDE CORRECTIVE ACTION FOR UNINCORPORATED COMMITMENTS/DESIGN ELEMENTS.

NOTE:

•ANY RELEVANT INPUT FROM THE PROGRAM TEAM REPORT WILL BE REVIEWED FOR APPLICABILITY TO THIS PHASE

FIGURE 5

PHASE III VERIFY TECHNICAL ADEQUACY OF EXISTING WBN IMPLEMENTING DOCUMENTS



OBJECTIVES

- ENSURE WBN IMPLEMENTING DOCUMENTS PROVIDE SUFFICIENT OBJECTIVE EVIDENCE TO RESOLVE COMMITMENTS/DESIGN ELEMENTS.
- PROVIDE CORRECTIVE ACTION FOR DOCUMENTS WHICH FAIL TO FULLY RESOLVE COMMITMENT/DESIGN ELEMENTS.

NOTE

- ANY RELEVANT INPUT FROM THE PROGRAM TEAM REPORT WILL BE REVIEWED FOR APPLICABILITY TO THIS PHASE

FIGURE 6

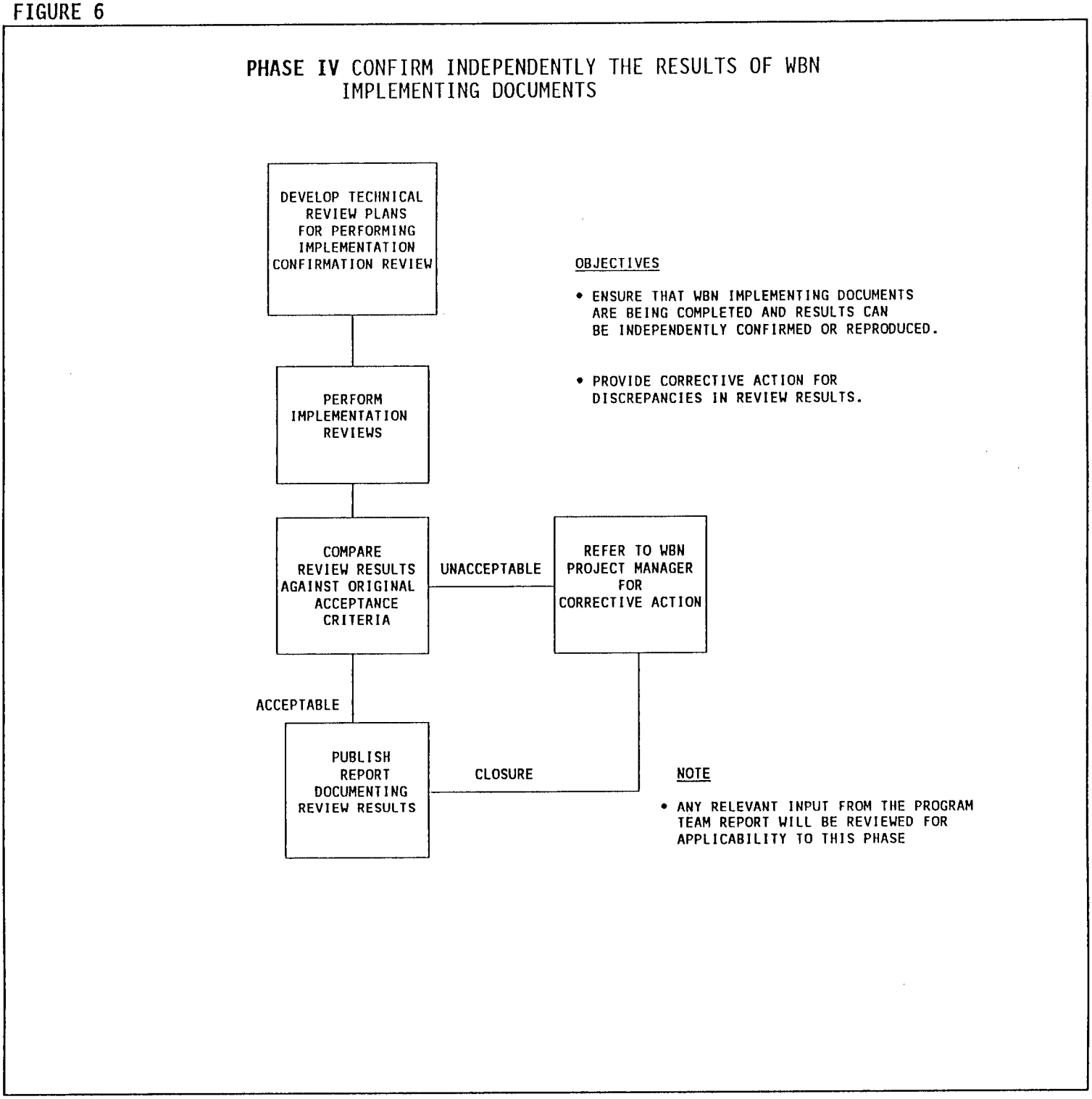
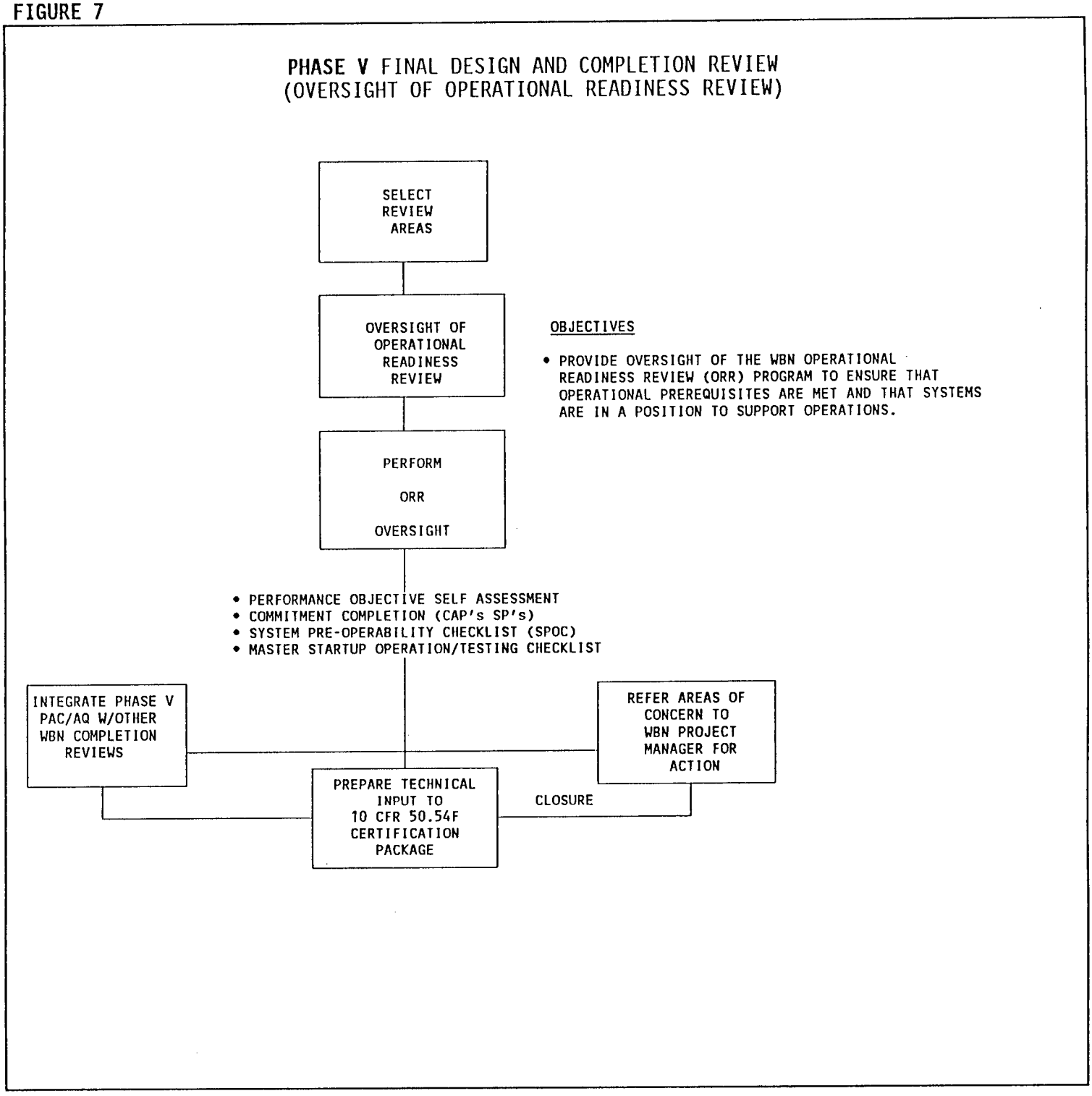

PHASE IV CONFIRM INDEPENDENTLY THE RESULTS OF WBN IMPLEMENTING DOCUMENTS
DEVELOP TECHNICAL REVIEW PLANS FOR PERFORMING IMPLEMENTATION CONFIRMATION REVIEW
PERFORM IMPLEMENTATION REVIEWS
COMPARE REVIEW RESULTS AGAINST ORIGINAL ACCEPTANCE CRITERIA
UNACCEPTABLE
REFER TO WBN PROJECT MANAGER FOR CORRECTIVE ACTION
ACCEPTABLE
PUBLISH REPORT DOCUMENTING REVIEW RESULTS
CLOSURE
OBJECTIVES
• ENSURE THAT WBN IMPLEMENTING DOCUMENTS ARE BEING COMPLETED AND RESULTS CAN BE INDEPENDENTLY CONFIRMED OR REPRODUCED.
• PROVIDE CORRECTIVE ACTION FOR DISCREPANCIES IN REVIEW RESULTS.
NOTE
• ANY RELEVANT INPUT FROM THE PROGRAM TEAM REPORT WILL BE REVIEWED FOR APPLICABILITY TO THIS PHASE

FIGURE 7


PHASE V FINAL DESIGN AND COMPLETION REVIEW
(OVERSIGHT OF OPERATIONAL READINESS REVIEW)
SELECT REVIEW AREAS
OVERSIGHT OF OPERATIONAL READINESS REVIEW
OBJECTIVES
• PROVIDE OVERSIGHT OF THE WBN OPERATIONAL READINESS REVIEW (ORR) PROGRAM TO ENSURE THAT OPERATIONAL PREREQUISITES ARE MET AND THAT SYSTEMS ARE IN A POSITION TO SUPPORT OPERATIONS.
PERFORM ORR OVERSIGHT
• PERFORMANCE OBJECTIVE SELF ASSESSMENT
• COMMITMENT COMPLETION (CAP's SP's)
• SYSTEM PRE-OPERABILITY CHECKLIST (SPOC)
• MASTER STARTUP OPERATION/TESTING CHECKLIST
INTEGRATE PHASE V PAC/AQ W/OTHER WBN COMPLETION REVIEWS
REFER AREAS OF CONCERN TO WBN PROJECT MANAGER FOR ACTION
PREPARE TECHNICAL INPUT TO 10 CFR 50.54F CERTIFICATION PACKAGE
CLOSURE

3.0 IMPLEMENTATION OF THE PROGRAM

Both the Plantwide and the Prototype PAC/AQ Programs will be implemented in accordance with detailed Project Instructions. The instructions will be sufficiently detailed, including logical flowcharts, to ensure that the overall methodology discussed in this Project Plan will be consistently applied through all phases.

Project Files, as well as the PAC/AQ Information System, will be maintained throughout all five phases in a manner to ensure an auditable history of the Project.

Findings developed throughout the execution of the Project will be reviewed for acceptable corrective action and tracked to final closure.

ENCLOSURE 3

REVISION 4 OF THE DESIGN BASELINE VERIFICATION PROGRAM (DBVP)
CORRECTIVE ACTION PROGRAM (CAP) PLAN
SUMMARY OF OUTSTANDING ISSUES

1. For commitments contained within the scope of the Licensing Verification area of the DBVP and those initiated subsequent to completion of the Licensing Verification activities, establish that the commitments are properly implemented.

Resolution

The documents reviewed under the scope of the Licensing Verification activities included docketed correspondence to the NRC initiated prior to December 15, 1988, the Final Safety Analysis Report (FSAR), the draft fuel load license, and the Draft 1985 Technical Specifications. As an element of Phase I and II of PAC/AQ, commitments will be cataloged and the source of implementation verified. The scope of Phase I and II of the PAC/AQ verification will encompass the original scope of the Licensing Verification activities with one exclusion. The draft fuel load license and Technical Specifications were excluded due to the broad changes which have occurred since the drafts were first developed. In addition, PAC/AQ will verify commitments defined in docketed correspondence initiated between December 16, 1988 and November 18, 1991.

2. Establishment of procedures, processes and/or systems to ensure commitments are properly controlled when changes to established site processes, design, or operational criteria are initiated.

Resolution

The actions required to resolve this item include:

- Revision 2 of Site Standard Practice (SSP) 4.03, "Managing and Tracking NRC Commitments," was placed in effect on November 18, 1991. This procedure defines the site process for commitment control administered by the Site Licensing organization and establishes requirements for source noting of programmatic activities in site controlling documents (i.e., procedures, design criteria, construction specifications, etc.).

- The Tracking and Reporting of Open Items (TROI) system is the mainframe based commitment tracking system. Two personal computer (PC) based programs have been developed which access TROI data. One system provides the user a means to query the TROI system without having to be knowledgeable of the mainframe access requirements. The other system allows the user to perform word or subject searches. These systems provide a tool to ensure that the ties between commitments and the documents which implement the commitments can be easily identified and maintained.

ENCLOSURE 3

REVISION 4 OF THE DESIGN BASELINE VERIFICATION PROGRAM (DBVP)
CORRECTIVE ACTION PROGRAM (CAP) PLAN
SUMMARY OF OUTSTANDING ISSUES

3. The development of a concise list of commitments and the integration of the three site programs associated with commitment control and implementation; DBVP, PAC/AQ, and the process for interface with the NRC administered by the Site Licensing organization.

Resolution

As of the date of submittal of Revision 4 of the DBVP CAP, 425 Open Item Reports (OIRs) remained to be resolved. These OIRs were initiated as part of the Licensing Verification area of the DBVP. Programmatic commitments verified to the source of implementation by PAC/AQ or the closure process for the remaining 425 OIRs will be source noted in the appropriate site controlling document and transitioned to Site Licensing for future control. Commitments verified to be inappropriately captured in an implementing document by either of these programs will be submitted to Site Licensing for tracking and resolution as an outstanding commitment in accordance with SSP 4.03. Through these actions, the three programs will be integrated, a list of programmatic commitments will be developed and maintained within the TROI system, and overall site control of commitments will be managed by the Site Licensing organization. In addition, the LDCM will no longer be utilized for commitment control. It will be updated to reflect the closure of the OIRs and then it will be archived.

ENCLOSURE 4

LIST OF COMMITMENTS

1. Other reports on the plant-wide portion of PAC/AQ will be made available to the resident inspection staff as each phase of the program is completed.