



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381

MAY 15 1992

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 )

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - QUALITY ASSURANCE (QA) RECORDS  
CORRECTIVE ACTION PROGRAM (CAP) PLAN, REVISION 5

TVA has completed its evaluation of the NRC Staff's technical position set forth in the letter to TVA dated April 10, 1992, concerning the QA Records CAP for WBN Unit 1. As a result of careful study of the NRC position, TVA has determined to revise its approach for sampling and statistical analysis. Enclosed, herewith, for NRC review and approval is Revision 5 of the CAP. In summary, the CAP has been revised to resolve the Staff's concerns through:

- ° Establishing a sampling and statistical analysis methodology based upon classical statistics with 95/5 acceptance criteria for primary deficiencies; and,
- ° Rigorously considering within the sampling and statistical analysis methodology the influence of deficiency root cause, extent of condition investigations and corrective actions, in meeting the 95/5 acceptance criteria.

The enclosed revision of the CAP addresses the key issues in a manner consistent with the Staff's technical position. TVA continues to believe that through effective implementation of the CAP, the necessary QA records will exist and be retrievable in an acceptable manner, with the required quality and technical content, in support of WBN Unit 1 licensing.

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As stated in our February 14, 1992 letter, TVA has pursued a careful and deliberate approach for this project. The earlier proposed sampling techniques, using nonclassical methods, were designed to provide a flexible and realistic approach in assessing the condition of many varieties of records. The enclosed CAP, as revised in accordance with the Staff's position, similarly will ensure that QA records will have been comprehensively assessed, and identified problems appropriately bounded for extent of condition and resolution.

Enclosure 2 to this letter provides a copy of the statistical sampling methodology cited as a reference in the CAP to assist in the Staff's review of the CAP.

Should there be any questions on this information, please contact P. L. Pace at (615) 365-1824.

Sincerely,



William J. Museler  
Site Vice President

Enclosures

cc (Enclosures):

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