



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

JUL 01 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 ) 50-391

WATTS BAR NUCLEAR PLANT - (UNIT 1) - CLARIFICATION OF REVISION 4 TO  
CORRECTIVE ACTION PROGRAM (CAP) PLAN FOR THE REPLACEMENT ITEMS PROGRAM  
(PIECE PARTS)

On February 3, 1992, TVA submitted Revision 4 to the Replacement Items  
Program (RIP) CAP for WBN Unit 1. Enclosed with the submittal were copies  
of the implementing procedures to assist NRC's review of the revised RIP CAP.

Subsequent to Revision 4 to the Corrective Action Program Plan for the  
Replacement Items Program and during a follow-up to a quality assurance (QA)  
audit of procurement activities at WBN, TVA discovered two statements that  
require clarification. A third minor issue related to Site Standard Practice  
(SSP)-10.D was included for completeness.

The first clarification involves the interface between the RIP CAP and the  
Material Improvement Project (MIP). Specifically, a statement was identified  
which could be interpreted to mean that a previous QA audit had fully  
reviewed and found the MIP acceptable. The relevant text from pages 5 and  
6 of the RIP CAP follows:

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9207060278 920701  
PDR ADOCK 05000390  
A PDR

A001  
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### Recurrence Control

Two major areas of recurrence control in the CAP have been fully implemented.

- ° Current and future procurements are reviewed for technical and quality requirements by Procurement Engineering Group (PEG) engineers in the procurement process.
- ° Current warehouse inventory is being reviewed and evaluated by the MIP engineers who prepare acceptance packages for material prior to its being made available for issue to the plant.

These areas were found to be acceptable in the September 1991 QA Assessment.

The need for clarification comes from a misinterpretation of the audit report. The audit report states:

The current procurement procedures [i.e., SSP-10.01 through SSP-10.05] and practices of the Watts Bar procurement engineering group for procurement of commercial grade items were recently reviewed during NQA&E audit number SSA 9114. The results of that audit indicated that the requirements of EPRI-NP-5652, "Guidelines for the Utilization of Commercial Grade Items in Nuclear Safety Related Applications," were on the whole being met.

The procedures were reviewed during the audit in conjunction with the PEG new procurement activities at WBN. The report conclusion only applies in this context. However, procedure SSP-10.05, "Technical Evaluation For Procurement," was also the implementing procedure for MIP engineering activities at the time of the audit. As a result, when the RIP CAP was being revised, the authors misinterpreted the audit conclusions regarding SSP-10.5 to mean that MIP had also been reviewed and found acceptable.

The second clarification involves reference to NRC Generic Letter 91-05. In sum, the RIP CAP (at page 1) suggests that it fully incorporates the guidance set forth in the generic letter. To the extent that the generic letter does not deviate from the guidance set forth in EPRI NP-5652 (which TVA has endorsed under the NUMARC 90-13 initiative), this position is correct. Furthermore, TVA has previously committed to meeting the intent of Generic Letter 89-02 which conditionally endorses EPRI NP-5652. Therefore, TVA wishes to clarify that the RIP CAP does not constitute an unqualified commitment to meet Generic Letter 91-05.

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In addition, WBN's use or reference to Generic Letter 91-05 in the associated implementing procedure, SSP-10.C should be clarified. In several procedure "notes," reference is made to the generic letter, and thus, TVA's position relative to these references is stated above.

The third clarification involves the reference to procedure SSP-10.D in the RIP CAP. Specifically, the last paragraph on page 8 describes the original plan to correct deficiencies in previously prepared Previous Procurement Substantiation Process (PPSP) packages for 10 CFR 50.49 commercial grade items. The retrofit procedure was designated as SSP-10.D. Prior to implementation of SSP-10.D, it was recognized that SSP-10.C (the parent RIP procedure) was sufficient. Therefore, SSP-10.D is no longer required by the RIP project and any reference to SSP-10.D should be superseded by SSP-10.C.

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

Sincerely,



William J. Museler  
Site Vice President

cc: NRC Resident Inspector  
Watts Bar Nuclear Plant  
P.O. Box 700  
Spring City, Tennessee 37381

Mr. P. S. Tam, Senior Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

Mr. B. A. Wilson, Project Chief  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323