



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 13, 1991

Docket No. 50-390

MEMORANDUM FOR: Frederick J. Hebdon, Director
Project Directorate II-4
Division of Reactor Projects
Office of Nuclear Reactor Regulation

FROM: E. William Brach, Chief
Performance and Quality Evaluation Branch
Division of Licensee Performance
and Quality Evaluation
Office of Nuclear Reactor Regulation

SUBJECT: WATTS BAR QA RECORDS REVIEW

By letter dated January 28, 1991, TVA submitted a document which describes its proposed Additional Systematic Records Review (ASRR). The ASRR is to provide additional confirmation of the adequacy of QA records for Watts Bar Nuclear Plant Unit 1. At the request of your LPM, Peter Tam, we have reviewed this submittal. We discussed the results of our review with the Senior Resident Inspector, Morris Branch, and his comments have been integrated with our comments below. A draft copy of these comments was provided to your staff and we discussed these comments with you, your staff, and TVA staff on March 11, 1991. We believe these comments should be responded to by TVA in a timely manner such that the ASRR does not proceed apace until the staff has a clearer understanding of and agrees with the program.

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

CONTACT:
Jack G. Spraul
49-21023

9103150173 910313
PDR ADDCK 05000390
A PDR

JFOI
1/0

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."

- 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.
- 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.

We are prepared to discuss the above with you and others as you deem appropriate.

E. William Brach, Chief
 Performance and Quality Evaluation Branch
 Division of Licensee Performance
 and Quality Evaluation
 Office of Nuclear Reactor Regulation

DISTRIBUTION:

Central File	PSTam
PDR	MBranch
LPEB R.F.	GAWalton
JWRoe	BAWilson
COThomas	
EWBrach	
EMMcKenna	
MBranch	
JGSpraul (2)	

* See previous concurrence

OFC	:LPEB:DLPQ	:RTI	:SC:LPEB:DLPQ	:C:LPEB:DLPQ	:DD:DLPQ	:D:DLPQ
NAME	:JGSpraul	:MBranch	:EMMcKenna	:EWBrach <i>3/12/91</i>	:COThomas	:JWRoe
DATE	:02/15/91*	:02/20/91*	:02/20/91*	:02/25/91*	:02/25/91*	:02/11/91

OFFICIAL RECORD COPY
 Document Name: MEMO TO HEBDON

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.

We are prepared to discuss the above with you and others as you deem appropriate.

E. William Brach, Chief
Performance and Quality Evaluation Branch
Division of Licensee Performance
and Quality Evaluation
Office of Nuclear Reactor Regulation

DISTRIBUTION:

Central File	PSTam
PDR	MBranch
LPEB R.F.	GAWalton
JWRoe	BAWilson
COThomas	
EWBrach	
EMMcKenna	
MBranch	
JGSpraul (2)	

* See previous concurrence

OFC	:LPEB:DLPO	:RTI	:SC:LPEB:DLPO	:C:LPEB:DLPO	:DD:DLPO	:D:DLPO
NAME	:JGSpraul	:MBranch	:EMMcKenna	:EWBrach 3/12/91	:COThomas	:JWRoe
DATE	:02/15/91*	:02/20/91*	:02/20/91*	:02/25/91*	:02/25/91*	:02/11/91

OFFICIAL RECORD COPY
Document Name: MEMO TO HEBDON