



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

January 30, 1992

Docket Nos. 50-390
and 50-391

LICENSEE: Tennessee Valley Authority (TVA)
FACILITY: Watts Bar Nuclear Plant, Units 1 and 2
SUBJECT: MEETING SUMMARY - JANUARY 27, 1992, MEETING ON THE
STATUS OF SEVERAL TOP PRIORITY ISSUES (TAC M72494,
M72495 and M71923)

On January 27, 1992, NRC and TVA representatives met at NRC offices in Rockville, Maryland, to discuss the status, needed actions, and schedules of several licensing issues considered by TVA to have top priority. These are the corrective action program (CAP) on cables, the special program (SP) on equipment qualification, SER Outstanding Issue 19(j) regarding structural steel, and the CAP on QA records (Enclosure 2 is a summary prepared by TVA on the changes made in Revision 4 of this CAP). In addition, the staff acknowledged receipt of FSAR Amendment 69, which TVA personnel described as mainly revising Chapter 14. Enclosure 1 is the list of meeting participants.

The participants agreed that the next milestones for the first 3 issues are as follows:

- o CAP on cables -- The staff will perform an audit the week of February 10, 1992. The staff will issue a safety evaluation on the Brand Rex cable issue by March 1992.
- o SP on equipment qualification -- The staff stated that it plans to hold a conference call with TVA probably during the week of February 3, 1992, to inform TVA of interim review results.

Memo 4

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- o Outstanding Issue 19(j) regarding structural steel -- The staff has stated its position to TVA in a letter dated January 27, 1992. It is incumbent upon TVA to provide a proposed course of actions.
- o CAP on QA records -- The staff provided an outline of its concerns in the form of 15 questions (Enclosure 3) based on Revision 4 of the CAP. The staff clarified each of those questions. TVA will provide a submittal formally addressing those questions. (No date for the submittal was provided, pending TVA's assessment of actual time needed to prepare the submittal.) TVA provided a brief summary of the changes made by Revision 4 (Enclosure 2).

Original signed by
Peter S. Tam, Senior Project Manager
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Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Participant list
2. Summary of Changes to
QA Records CAP
3. Questions on Revision 4 of the
QA records CAP

cc w/enclosures:
See next page

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|------|--------------------|-----------------|--------------------|
| OFC | PD II-4LA | PD II-4PM | PD II-4PD |
| NAME | MSanders <i>MS</i> | PTam <i>PST</i> | FHebdorn <i>FH</i> |
| DATE | 1/30/92 | 1/30/92 | 1/30/92 |

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ENCLOSURE 1

LIST OF PARTICIPANTS

ROUTINE LICENSING STATUS MEETING

JANUARY 27, 1992

| <u>Name</u> | <u>Affiliation</u> |
|----------------------|------------------------------------------------------|
| Lee Abramson | NRC/Office of Research |
| John Garrity | TVA/Watts Bar |
| Fred Hebdon | NRC/NRR/Project Directorate II-4 |
| Ron Gibbs (by phone) | NRC/Region II |
| Roger Huston | TVA/Rockville Office |
| Stan Kaplan | PLG (TVA consultant) |
| Gus Lainas | NRC/NRR/Division of Reactor Projects I/II |
| Howard Levin | TENERA (TVA consultant) |
| Robert Lewis | TVA/Watts Bar |
| Eileen McKenna | NRC/NRR/Performance and Quality Evaluation Branch |
| George Pannell | TVA/Watts Bar Site Licensing |
| Jack Spraul | NRC/NRR/Performance and Quality Evaluation Branch |
| Peter Tam | NRC/NRR/Project Directorate II-4 |
| Charlie Touchstone | TVA/Watts Bar Site Licensing |
| Steve Varga | NRC/NRR/Division of Reactor Projects I/II |
| Jake Wechselberger | NRC/Office of the Executive Director |

INITIAL QA RECORDS CAP

**ADDRESS RECORDS ISSUES RELATED TO CONSTRUCTION AND
OPERATIONS RECORDS**

STORAGE

RETRIEVABILITY

RECORDS QUALITY

NEW QA RECORDS CAP REVISION

COMPREHENSIVE SYSTEMATIC REVIEW

REVIEW OF HARDWARE AGAINST RECORDS

REVIEW OF TECHNICAL CONTENT OF RECORDS

STATISTICAL ANALYSIS OF RESULTS

RECORDS MANAGEMENT SYSTEM UPGRADES

NRC Staff Handout for 1-27-92 Meeting**REV. 4 OF TVA'S QA RECORDS CAP - WATTS BAR UNIT 1**

(Submitted by letter dated December 6, 1991)

1. Section 4.1.1 of the CAP refers to TVA's QA Topical Report (TVA-TR75-1A). The QA Topical Report has been superseded by the TVA Nuclear QA Plan (TVA-NQA-PLN-89), and this should be reflected in the next revision of the CAP.
2. Section 4.1.2 of the CAP states that the Record Retrieval Guide is now available to users. Clarify whether or not the Record Retrieval Guide and its related documentation are treated as controlled documents in accordance with the TVA Nuclear QA Plan.
3. Section 4.3.2 of the CAP lists four ways that records can be "required." A fifth way would be the requirement to meet TVA commitments in licensing documents (for example, records required to meet TVA's commitment to Regulatory Guide 1.88 as given on pages 96 and 97 of the Nuclear QA Plan). This fifth way should be included in Section 4.3.2 of the CAP.
4. Section 4.3.4 of the CAP indicates that nonconformances will be considered design significant if they do not meet appropriate codes, standards, or licensing requirements. As in item 3, above, nonconformances to TVA commitments in licensing documents is a fourth set of nonconformances that should also be considered design significant and referred to in Section 4.3.4 of the CAP. This comment also applies to the fourth paragraph in Section 2.e of the ASRR (page 7).
5. The fifth bullet in CAP Section 4.4 states that WBN records from organizations at WBN will be filmed and indexed onsite. In this respect, clarify how TVA will treat WBN records from organizations not at the site.
6. Attachment 4 to the CAP should not be considered a complete list of records required by regulation. For example, Attachment 4 could be interpreted to indicate that the only record required by 10CFR 50, Appendix B, is a QA Plan. This point should be clarified.
7. Clarify the first sentence on page 10 of the ASRR which states: "The WPs/MRs generated during the timeframe of the CAPs/SPs (i.e., after 1987) will be evaluated." Does this mean that there will be a 100% independent assessment of these documents, or will a sampling plan be used?

8. What is meant by "Secondary deficiencies will be evaluated on a page basis" on the middle of page 10 of the ASRR?
9. Section 6.b of the ASRR indicates that a record plan is developed for each CAP/SP which meets four specific criteria. Are these plans and the results of their implementation independently reviewed within TVA to ensure acceptability?
10. The last paragraph on page 4 of the ASRR indicates that CAP records will be reviewed where they apply. We believe that this means that CAP records will be included in the record population(s) from which the samples for each "cell" on Figure 1 are randomly selected. Clarify whether this is the case. If so, the randomness of a selected sample (within each "cell") assumes even greater importance. Therefore, describe how samples are selected to ensure randomness. If not, what is meant?
11. Delete or clarify what is meant by: "except where the ANSI record type in question has already been sufficiently sampled" [Middle of page 5 of the ASRR, Section 2.c(4)]. Our understanding from TVA's July 2, 1991 letter is that the ASRR is to "stand alone" and not rely on previous reviews.
12. TVA responded to NRC's earlier question 13E by letter dated May 10, 1991. The weighting procedure described at the top of page 8 of CAP Attachment 6 (the ASRR) is taken from Reference 3¹ of the May 10 letter. We were unable to find Equation 2 of the weighting procedure in this reference. Explain the use of the equation.
13. TVA's sampling statistics are based on Figure 2 in the same reference. Since this reference adopts a Bayesian approach, we have the following questions:
 - (a) What is the justification for using a Bayesian as opposed to a standard classical approach?
 - (b) What is the prior distribution of the defect fraction used to calculate the curves in Figure 2 of the reference? On what basis was it chosen?
 - (c) What prior distributions will be used for the weighted average technique and on what bases were they chosen?

¹ Kaplan, S., "Bayesian Sampling for Quality Confidence-II," Pickard, Lowe, and Garrick, Inc., prepared for Tennessee Valley Authority, PLG-0806, Revision 1, March 1991.

(d) What is the sensitivity of the results to the prior distributions used in (b) and (c) above?

14. Using a standard classical probability approach, the last several sentences of the second paragraph of Section 2.e of the ASRR would be correct if they were revised as follows:

A 95 percent confidence that there are less than 5 [not 3] percent deficiencies in the remaining population (95/5) [not 95/3] could be established by finding no deficiencies in a sample of 60. Similarly, satisfying 95/3 could be established by finding no deficiencies in a sample of 100 [not 60]. Similarly, satisfying 95/5 could be established by finding less than or equal to one deficiency in a sample of 93 [not 60]. A 95/10 could be satisfied by finding less than or equal to three deficiencies in a sample of 75.

Or the last sentence could say:

A 95/10 could be satisfied by less than or equal to two deficiencies in a sample of 61.

Or:

A 95/10 could be satisfied by less than or equal to one deficiency in a sample of 46.

Or:

A 95/10 could be satisfied by finding no deficiency in a sample of 30.

15. Whether using the sampling plan and acceptance criteria proposed in the ASRR or using a standard classical approach, the question arises as to what happens if the acceptance criterion is not met. We understand that the "extent of condition" will be determined and followed-up to reduce the probability of finding another deficiency in the same cell when the next sample is randomly selected. Clarify whether another random (though "stratified") sample will be tested for the new, improved, population.

January 17, 1992

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