

Docket



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

May 13, 1992

Docket No. 50-390
and 50-391

MEMORANDUM FOR: Kenneth P. Barr, Section Chief
Project Branch No. 4
Division of Reactor Projects
Region II

FROM: Peter S. Tam, Senior Project Manager
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

SUBJECT: WATTS BAR NUCLEAR PLANT - REGION II INSPECTION FOLLOWUP
OF NRR PROGRAM REVIEW ISSUES (TAC M72494 AND M72495)

In the NRR-Region II meeting on April 14, 1992, you expressed a concern that in various letters, safety evaluations, or safety evaluation reports, NRR may have made commitments for Region II to inspect implementation of certain issues.

I have considered your concern and prepared the following response, addressing different likely sources of needed followup inspections:

(1) Bulletins Since Mid-1987

Since the functions of the Office of Inspection and Enforcement were incorporated into NRR in 1987, NRR has taken over the responsibility of issuing Bulletins. For any bulletin that requires licensee response and NRR review, the Associate Director of Projects would appoint a lead project manager, who would provide plant project managers with an NRR-approved response to be issued to the licensees. A typical response issued by the project manager would say that the licensee's submittal is responsive to the bulletin, but implementation of provisions of the bulletin is subject to a probable future inspection/audit.

For all such bulletins, the NRR has been tasked with preparing temporary instructions (TIs) to communicate instructions for needed followup inspections. In summary, any inspection followup will be performed by the regions as a result of a published TI, not merely as a result of the "commitment" in the project manager's letter.

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(2) Generic Letters

NRR has issued all generic letters. Most generic letters require licensee response and subsequent NRR review of the response. Review of the response is normally prescribed by published guidance documents, such as the Standard Review Plan, and internal memoranda prepared by lead project managers. Any inspections required will be prescribed in Inspection Manual sections or TIs.

In summary, any inspection followup will be performed by the regions as a result of a published manual section or TI, not merely as a result of the "commitment" in the safety evaluation addressing the issue.

(3) Watts Bar SER (NUREG-0847) and Supplements (SSERs) 1-4

These NRR licensing basis documents were prepared in the 1982 to 1985 time frame, by previous project managers under previous NRR organizations. For resolution of various issues in these documents, NRR has stated that followup inspections would be needed. Since the current organization did not issue these documents, we could not be sure that all proposed followup inspections have been captured. To gain such confidence, we requested TVA site licensing to perform a word search using their FOLIO software. We have subsequently reviewed all pages from these documents containing the words "inspection" or "inspect" and found that there is no "commitment" to inspect anything that was not already captured. All such "commitments" have been identified as outstanding issues, confirmatory issues, or proposed license conditions in those documents. All unresolved issues are discussed in the NRR monthly licensing status meetings. The most current SSER documents the closeout status of each issue.

In summary, Region II can be assured that the Watts Bar SER and SSERs 1-4 do not contain commitments that Region II is not already aware of.

4) Watts Bar SSER 5-8

The current NRR project organization issued these documents and is responsible for issuing future SSERs. Wherever we committed to perform an inspection/audit, the reviewer who wrote that evaluation has been tasked to perform the inspection/audit. Furthermore, the inspection/audit is being tracked by the required implementation status of the NRR Work Identification and Scheduling Program (WISP). The status of all NRR inspections or audits are discussed in the monthly licensing status meetings.

In summary, any plant-specific inspection/audit committed to in SSER 5-8, and future SSERs, will be performed by NRR personnel, unless NRR formally requests (i.e., via a TIA) Region II assistance.

(5) Corrective Action Programs (CAPs) and Special Programs (SPs)

The CAPs and SPs were formulated by the Associate Directorate of Special Projects, which was part of NRR. For many CAPs and SPs, the same reviewers reviewed the programs and subsequently inspected implementation. When Special Projects was abolished in June 1990, review and inspection functions presumably were split in the traditional manner between NRR and Region II.

However, we recognize that the split may not be totally clean, since most CAPs and SPs are not "traditional" licensing issues. Our remedy is the monthly licensing status meeting, which is normally attended by Region II personnel, and frequent telecons between NRR and Region II personnel. These activities assure that needed inspections or audits are performed. Furthermore, the project manager insists that all NRR reviewers performing any site activity first hold in-depth discussions with Region II personnel to avoid any likelihood of overlap or oversight.

In summary, we believe that through frequent communications, reviewers and inspectors are fully aware of needed followup actions.

Original signed by

Peter S. Tam, Senior Project Manager
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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