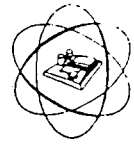


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TENNESSEE VALLEY AUTHORITY
OFFICE OF POWER



NUCLEAR SAFETY REVIEW PROCEDURE

No. POWER-NSRP 3.1 Rev. 0

Issue Date 1-2-81 Rev. Date 1-2-81

Title: CONDUCT OF NSRB REVIEWS

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1.0 PURPOSE

To describe the NSRB review process, provide guidance and direction to reviewers in the conduct of reviews, and to describe the reporting and documentation of review results.

2.0 SCOPE

The provisions of this procedure apply to the conduct and accomplishment of the independent review function for operational nuclear plants as described in the NSRB Charter and the technical specifications for each nuclear plant.

3.0 REFERENCES

- 3.1 Office of Power, Nuclear Safety Review Board Charter
- 3.2 Technical specifications for each operating nuclear plant
- 3.3 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants (ANSI N 18.7-1976)
- 3.4 Quality Assurance Program Requirements (Operation) NRC Regulatory Guide 1.33

4.0 ABBREVIATIONS AND DEFINITIONS

- 4.1 BF-NSRB - Browns Ferry Nuclear Safety Review Board
- 4.2 S-NSRB - Sequoyah Nuclear Safety Review Board
- 4.3 NSRB - Nuclear Safety Review Board (both BF-NSRB and S-NSRB)
- 4.4 NSS - Nuclear Safety Staff of the Office of Power
- 4.5 Regular Review Subject - A document which bears relationship to subjects required to be reviewed by the NSRB. Attachment 1 provides examples of regular review subjects.
- 4.6 Special Review Subject - Any subject not specifically identified as a regular review subject. For example, special, generic, long-term or recurring events and concerns, and NSS or NSRB investigations and studies.

5.0 RESPONSIBILITIES

5.1 Responsibility for the performance of tasks specified in this procedure shall rest with those individuals and organizations assigned the tasks.

6.0 PROCEDURE/REQUIREMENTS

6.1 Regular and Special Review Subjects

6.1.1 Regular Review Subjects

6.1.1.1 Attachment 1 relates several specific types of documents which are reviewed as regular review subjects to general NSRB requirements as specified in the NSRB Charter and in the plant technical specifications.

6.1.1.2 The NSRB accomplished its review of regular review subjects by:

- a. having its individual members review the documents described in Attachment 1, and
- b. reviewing, in a NSRB meeting, all subjects which have been reviewed by individual members.

6.1.2 Special Review Subjects

6.1.2.1 Special review subjects are designated by the NSRB and the reviews are conducted in the manner specified by the NSRB.

6.1.2.2 To facilitate following a special review subject to completion of the review, if such review is not completed in one meeting, the subject should ordinarily be entered on the report entitled "Subjects Requiring NSRB Action" as a special, generic, long-term, or recurring subject and completed according to Attachment 3 to this procedure.

6.2 Review of Regular Review Subjects - Transmittal Sheets

Each document transmitted by the NSS to individual NSRB members, alternates, or consultants for review or information is attached to a transmittal sheet (Attachment 2 is a typical transmittal sheet). Different transmittal sheet forms are used, depending on the nature of the document being sent for NSRB review or information. Transmittal sheet titles include:

- a. Reportable Occurrence, Deficiency, 10 CFR 21 Report or Related Item
- b. NRC-IE Originated Document (Bulletin, Inspection, Alleged Violation, Etc.)
or Related Item
- c. Audit Report or Related Item
- d. PORC Minutes, Report or Related Item
- e. License or Technical Specification Change or Related Item
- f. Procedure Change or Related Item
- g. Special Tests, Experiments or Activities
- h. Plant Modification or Related Item
- i. Safety Related Material (not classified elsewhere)
- j. Information Transmittal

The transmittal sheet prepared by the NSS indicates the NSRB to which the document is assigned and lists the appropriate reviewers.

6.3 Review of Regular Review Subjects by Individual Reviewers

6.3.1 General Considerations

Each reviewer shall provide any comments, initial, and date the transmittal sheet at the bottom, and return it to the NSS for coding and filing (the document which was reviewed and which was attached to the transmittal sheet may be retained by the reviewer). There are two exceptions to the above:

- a. Information transmittal sheets need not be initialed and returned to NSS unless the reviewer wishes to bring a comment to the attention of the NSS. Documents transmitted for information are not considered required NSRB review material.
- b. If a reviewer believes he was involved in the preparation of a document to the extent that his independent review is jeopardized, the transmittal sheet shall be returned to NSS without his initials. In this case, the reviewer shall provide a comment on the transmittal sheet to this effect.

- 6.3.2 Satisfactory/No Action Required - Reviewer initials here indicate that, in the reviewer's judgment, the document is satisfactory or requires no NSRB or NSS action. Initials in this location from all reviewers will result in the document appearing on the periodic report entitled "NSRB Review Concluded." A reviewer may initial in this location and also provide comments. However, the comments will be considered minor, will only be seen by the NSS, and NSRB review of the comment is not required. In this case, the periodic report entitled "NSRB Review Concluded" will note that a minor comment was made by the reviewer.
- 6.3.3 Satisfactory Under Above Listed Conditions - Transmittal sheets with reviewer initials here shall also contain reviewer comments. Initials in this location from one or more reviewers will result in the document and comment appearing on the periodic report entitled "Subjects Requiring NSRB Action." This ensures that the document and reviewer(s) comments are automatically included on an agenda for discussion at a NSRB meeting. The commenting reviewer is expected to bring the document to the meeting. Initialing in this location should not be done for the sole purpose of conveying information to all other NSRB members.
- 6.3.4 Unsatisfactory for Above Reasons - Reviewer initials here indicate a greater degree of perceived seriousness than that described in 6.3.3. It indicates to the NSS and the NSRB that the reviewer has a high level of concern. The review process is identical to that of section 6.3.3.
- 6.3.5 Subject is USQ - A reviewer should check this box if he believes the information contained in the document represents an unreviewed safety question and it has not been previously recognized within TVA as an unreviewed safety question. This box should not be checked unless the reviewer has initialed as "unsatisfactory for above reasons."

6.3.6 Report Comment Immediately - A reviewer check in this box will result in the NSS sending the transmittal sheet containing the reviewer's comments to all other NSRB members as soon as possible. This box should be checked if the reviewer wants to make sure the comment is discussed in the next meeting (the date may have passed for including comments in the current issue of the periodic report entitled "Subjects Requiring NSRB Action"), or if he desires a special meeting to discuss the significance of the problem. This box should also be checked if "Subject is USQ" has been checked.

6.3.7 Timeliness of Reviews

Reviewers shall perform their reviews and return their review sheets in a timely manner, normally not more than 14 days from receipt of document. In preparation for regularly scheduled NSRB meetings, members and alternates should review the subjects listed on the periodic report entitled "Subjects Requiring NSRB Action."

6.3.8 Technical Guidance to Reviewers

Appendix 1 provides technical guidance to reviewers.

6.4 Review of Regular Review Subjects by the NSRB

Attachment 3 illustrates the process by which the NSRB reviews regular review subjects. The process is initiated by and keyed from the return to the NSS of the initialed transmittal sheet.

6.4.1 General Considerations

A periodic report entitled "Subjects Requiring NSRB Action" is issued by the NSS. This report is a series of tables consisting of the various regular review subjects for which one or more reviewers have indicated as being unsatisfactory or satisfactory under listed conditions, and a table of special, generic, long-term, or recurring concerns specified by the NSRB and any other tables specified by the NSRB. In addition to an

appropriate description, including a document identification number, each subject in the report includes summaries of all comments by individual reviewers and of all actions taken by the-NSRB. Each of these subjects appears on each issue of the periodic report until the review by the NSRB is concluded.

6.4.2 Review Aids

NSRB review of subjects requiring NSRB action shall be accomplished by the board during one or more meetings. To aid in its review the board may:

- a. utilize consultants
- b. request the performance of audits
- c. form a subcommittee to obtain information, investigate situations, formulate recommendations, etc.
- d. conduct investigations
- e. utilize memoranda to obtain information, etc.
- f. utilize NSS to obtain information, resolve issues, coordinate efforts, etc.
- g. use any other appropriate technique

6.4.3 Conclusion of NSRB Review

NSRB review of a regular review subject is considered concluded if no reviewer initials the transmittal sheet as "Unsatisfactory" or "Satisfactory Under Listed Conditions" and if a quorum initials the sheet as "Satisfactory." NSRB review is also considered concluded whenever the board concludes its action on a subject requiring NSRB action.

NOTE: NSRB action on a particular subject may be concluded and the NSRB concern transferred to a special, generic, long-term, or recurring subject.

NOTE: If the conclusion of NSRB action results in a minority or dissenting opinion, the minority or dissenting opinion shall be adequately stated in the meeting report to the Manager of Power.

6.4.4 Documentation and Reporting of NSRB Review Results

- 6.4.4.1 All subjects for which NSRB action is concluded shall appear on a periodic report entitled "NSRB Action Concluded." This report is similar to the report entitled "Subjects Requiring NSRB Action" except that the final NSRB action is included. This report is filed and documents NSRB action taken.
- 6.4.4.2 All subjects for which NSRB review is concluded shall appear on a periodic report entitled "NSRB Review Concluded." This report simply describes the subjects without any indication of the results of the NSRB review.
- 6.4.4.3 Completion of the review of each subject shall be accomplished during a NSRB meeting by formal approval of the report "NSRB Review Concluded." This report shall be attached to the report of the meeting which is addressed to the Manager of Power with copies to the appropriate management, including the plant manager.
- 6.4.4.4 Results of NSRB review of a subject may also be reported as:
- a. a recommendation in writing to the Manager of Power
 - b. a recommendation in writing to a division director or staff chief within TVA, with a copy to the Manager of Power

6.5 NSRB Meetings

6.5.1 Meeting Frequency

The minimum meeting schedule is specified in references 3.1 and 3.2. However, in general, NSRB meetings are regularly scheduled once each month. In addition, other meetings may be held to consider safety-related matters on an as-needed basis.

NOTE: Meetings may be held where all or some of the members may be present by telephone communication.

6.5.2 Agenda

Insofar as practicable, all meetings are conducted in accordance with an agenda which will be distributed to the members prior to the meeting.

The agenda for regularly scheduled meetings and the following three reports are normally distributed by the NSS to the members one week prior to the meeting:

- a. NSRB Review Concluded During the Period from (date) to (date)
- b. NSRB Action Concluded During the Period from (date) to (date)
- c. Subjects Requiring NSRB Action as of (date)

NSRB members may add special review subjects to the agenda by contacting the NSS in advance of the meeting or by identifying the subject at the beginning of the meeting.

6.5.3 Typical Agenda for Regularly Scheduled Meetings

I. Administrative

- A. NSRB approval of meeting reports previously transmitted to the Manager of Power (revisions to previously approved and transmitted reports are possible at this time by amending report).
- B. Formal NSRB approval of a report entitled "Reviews Concluded During the Period from (date) to (date) "

II. Technical

- A. Review/briefings/status reports on special review subjects designated for this meeting
- B. Discussion of OPQA&AS audit schedules and plans
- C. Discussion of subjects which appear on the report entitled "Subjects Requiring NSRB Action as of (date) "

III. Other Matters (for example)

- A. Planning session for future activities
- B. Plant observation/inspection
- C. Significant technical issues which may have developed within the preceding two weeks

6.6 Use of Alternate NSRB Members6.6.1 Alternates for Performing Individual Review of Regular Review Subjects

On occasion principal NSRB members may be unavailable for an extended period to perform individual review of regular review subjects transmitted to them. Examples of this circumstance include vacations, illness, and out-of-town business. The NSRB member shall decide whether or not an alternate should perform such reviews in his absence. A projected absence of five working days or less should not normally require the use of an alternate. The use of an alternate should be seriously considered for projected absences in excess of five working days and is highly recommended for absences in excess of ten working days.

The NSRB member shall contact the assigned alternate from his organization and arrange for such individual review by the alternate. The member shall also notify the NSS of his impending absence and inform the NSS when documents should be transmitted to the alternate. If the alternate will not be available, the NSRB member shall contact the NSS.

Alternates shall not be used for the sole reason that the NSRB member's workload is too heavy. If workload is jeopardizing the quality of the member's review, the member shall contact the NSRB chairman.

In cases where an alternate has performed individual reviews of regular review subjects in the member's absence, but the member plans to attend the regularly scheduled NSRB meeting, the alternate shall either attend

the meeting or give the member copies of any documents on which he had comments and explain the comments to the member.

6.6.2 Alternates as Voting Members During Meetings

If a NSRB member is not able to attend NSRB meetings the member shall:

- a. contact the assigned alternate from his organization and arrange for attendance by the alternate, and
- b. notify the NSS of his intended absence and replacement by the alternate.

If the alternate will not be available, the NSRB member shall inform the NSS. Before the meeting the NSRB member is expected to give his alternate copies of any documents on which he had comments and to explain the comments to the alternate. The NSRB member should also discuss his views on known agenda items with his alternate before the meeting.

The chairman shall designate in writing an alternate chairman.

Attachments

1. Relationship Between General NSRB Review Requirements and Regular Review Subjects
2. Typical Transmittal Sheet
3. NSRB Review Process for Regular Review Subjects

APPENDICES

1. Technical Guidance for Reviewers

ATTACHMENT 1

RELATIONSHIP BETWEEN GENERAL NSRB REVIEW REQUIREMENTS AND REGULAR REVIEW SUBJECTS

This attachment lists the NSRB review requirements and provides examples of corresponding regular review subjects. Review of these subjects also enables the NSRB to ascertain that adequate administrative and management controls exist and are being implemented to ensure the nuclear safety of plant operation and aids the NSRB in advising the Manager of Power on the nuclear safety significance of TVA activities and on the adequacy and implementation of TVA nuclear safety policies and programs.

1.1 Requirement

The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question

1.2 Regular Review Subjects

- a. Cover sheets (includes scope and approvals), safety evaluations, Unreviewed Safety Question Determinations (USQD's) for Engineering Change Notices (ECN's) and Design Change Requests (DCR's)
- b. Special Test, Experiment, or Activity Requests (STEAR's), including safety evaluations and USQD's

2.1 Requirement

Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR

2.2 Regular Review Subjects

- a. Cover sheets, safety evaluations, USQD's for ECN's and DCR's
- b. Associated submittals to NRC, license and technical specification changes

3.1 Requirement

Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR

3.2 Regular Review Subjects

- a. STEAR's, including safety evaluations and USQD's
- b. Associated submittals to NRC, license and technical specification changes

4.1 Requirement

Proposed changes to technical specifications or licenses

4.2 Regular Review Subjects

- a. Draft proposed license and technical specification changes
- b. TVA-proposed license and technical specification changes
- c. NRC-issued license and technical specification changes and associated safety evaluations (NRC-issued technical specification and license changes identical to previously reviewed proposed changes are not rereviewed)

5.1 Requirement

Violations of codes, regulations, orders, technical specifications, license requirements, or of internal procedures or instructions having nuclear safety significance

5.2 Regular Review Subjects

- a. Audit reports, findings, and responses, including corrective actions
- b. NRC-IE orders, inspection reports and TVA responses, including corrective actions
- c. NRC-IE bulletins, circulars, and information notices and responses thereto
- d. Reportable occurrence reports
- e. Nuclear Safety Review Staff (NSRS) documents containing recommendations and responses thereto
- f. 10 CFR 21 reports

6.1 Requirement

Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety

6.2 Regular Review Subjects

- a. Reportable occurrence reports
- b. Audit reports and NRC-IE inspection reports and responses to these reports
- c. 10 CFR 21 reports
- d. Core Component Operational Safety Evaluations (CCOSE's)
- e. NSRS documents containing recommendations and responses thereto
- f. ECN's and DCR's
- g. NRC-IE, orders, bulletins, circulars, information notices, and responses thereto
- h. STEAR's

7.1 Requirement

Reportable occurrences (both prompt and 30 day) notification to the Nuclear Regulatory Commission

7.2 Regular Review Subjects

- a. 24-hour report to NRC
- b. Draft reports approved by PORC, including 10 CFR 21 determinations
- c. Reports sent to NRC
- d. Corrected and supplemental reports sent to NRC
- e. Evaluation of occurrence by NUC PR

8.1 Requirement

All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety

8.2 Regular Review Subjects

- a. Reportable occurrence reports
- b. Audit reports and NRC-IE inspection reports and responses to these reports
- c. 10 CFR 21 reports
- d. CCOSE's
- e. NSRS documents containing recommendations and responses thereto
- f. ECN's and DCR's
- g. NRC-IE orders, bulletins, circulars, information notices, and responses thereto
- h. STEAR's

9.1 Requirement

Reports and meeting minutes of the PORC and RARC

9.2 Regular Review Subjects

- a. Meeting minutes of the PORC and RARC

10.1 Requirement

The quality assurance audit program to determine that audits are being accomplished in accordance with TVA requirements and the requirements of the plant technical specifications

10.2 Regular Review Subjects

- a. Audit plans and schedules and reports
- b. Summary reports of open items

11.1 Requirement

Reports of audits conducted in accordance with TVA requirements and the requirements of the plant technical specifications

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11.2 Regular Review Subjects

- a. Audit reports and findings
- b. Responses to audit reports, including corrective actions
- c. Summary reports of open items

Rev. 11-24-80

TYPICAL TRANSMITTAL SHEET

NUCLEAR SAFETY REVIEW BOARD

REVIEW OF: SAFETY RELATED MATERIAL (NOT CLASSIFIED ELSEWHERE)

Browns Ferry

Sequoyah

Document No. _____

F. A. Szczepanski
T. M. Galbreth
J. A. Domer
J. W. Hutton
W. D. Poling
J. D. Robertson

F. A. Szczepanski
M. R. Harding
G. W. Killian
D. L. Lambert
D. L. Paul
G. W. Smith

Doc. Ident. No. _____

Plant(s)/Unit(s) _____

Date of Document _____

Date Transmitted _____

Subject or Title: _____

Note:

Reference:

Please review the attached document, indicate the results of your review, and return this sheet to the NSS, 417 UBB-C.

COMMENTS:

() Subject is USQ

() Report comment immediately

Unsatisfactory for
above reasons

Satisfactory under above
listed conditions

Satisfactory/no
action required

Initial _____

Date _____

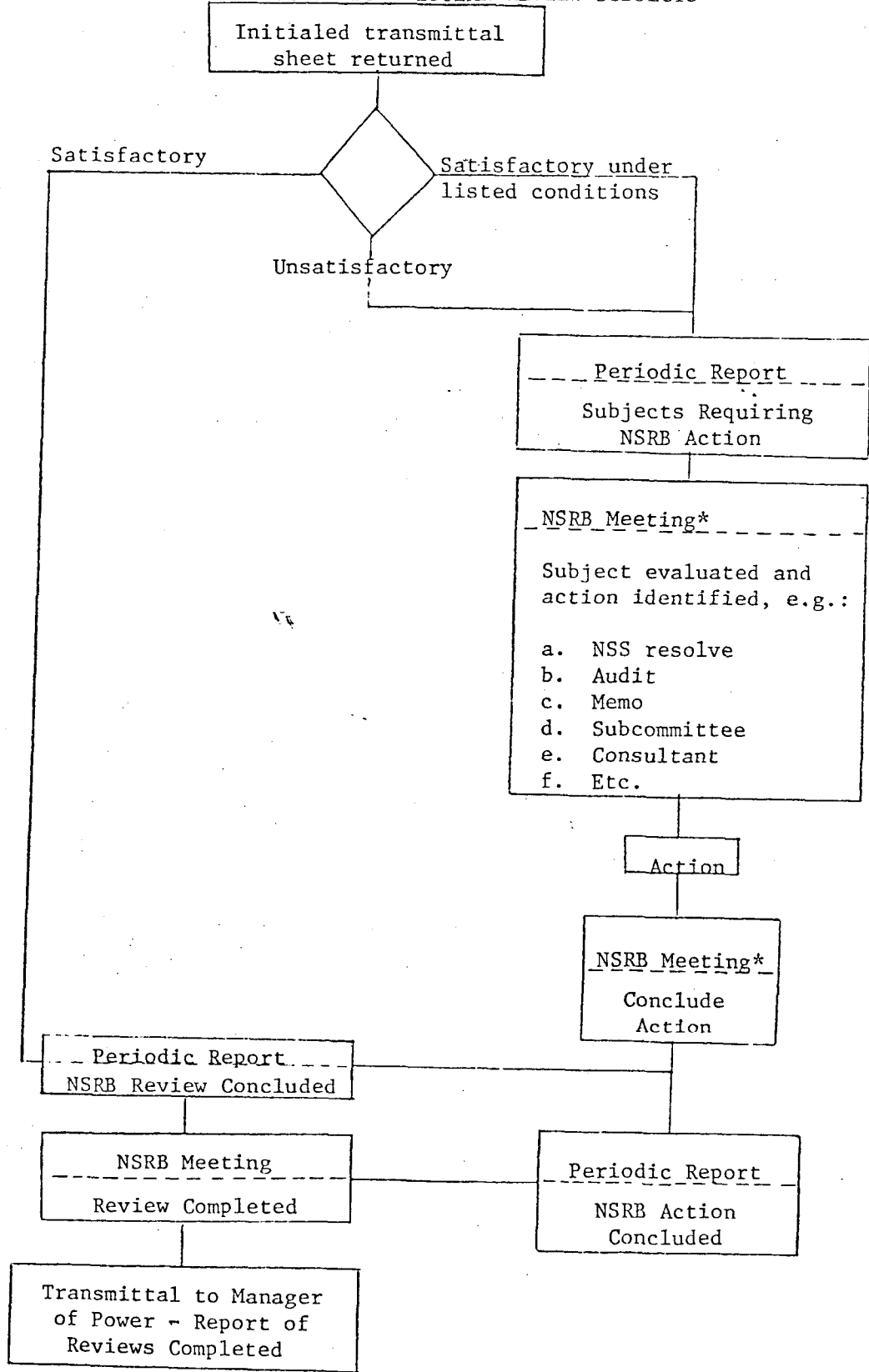
Initial _____

Date _____

Initial _____

Date _____

NSRB REVIEW PROCESS FOR REGULAR REVIEW SUBJECTS



*The functions identified in these blocks may be accomplished in one or more meetings as appropriate

APPENDIX I

TECHNICAL GUIDANCE FOR REVIEWERS

This appendix provides guidance to NSRB members, alternates, and consultants so they will have a more complete understanding of their role in the independent nuclear safety review function. Part I includes several key definitions. Part II provides guidance of a general nature. Part III provides specific guidance related to regular review subjects transmitted for individual review.

I. DEFINITIONS

1. Permissible changes and tests: The holder of a license authorizing operation of a production or utilization facility may:
 - (i) make changes in the facility as described in the safety analysis report,
 - (ii) make changes in the procedures as described in the safety analysis report, and
 - (iii) conduct tests or experiments not described in the safety analysis report, without prior Commission approval, unless the proposed change, test or experiment involves a change in the technical specifications incorporated in the license or an unreviewed safety question (10 CFR 50.59)
2. Unreviewed Safety Question (USQ): A proposed change, test, or experiment shall be deemed to involve an unreviewed safety question:
 - (i) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased; or
 - (ii) if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created; or

- (iii) if the margin of safety as defined in the basis for any technical specification is reduced (10 CFR 50.59)
3. Review: A deliberately critical examination, including observation of plant operation, evaluation of audit results, procedures, certain contemplated actions, and after-the-fact investigations of abnormal conditions (ANSI N 18.7 (1976))
 4. Independent Review: Review completed by personnel not having direct responsibility for the work function under review regardless of whether they operate as a part of an organizational unit or as individual staff members (ANSI N 18.7 (1976))
 5. Quality Assurance: All those planned and systematic actions necessary to provide assurance that a structure, system or component will perform satisfactorily in service. It applies to all activities associated with doing a job correctly as well as verifying and documenting the satisfactory completion of the work (ANSI N 18.7 (1976))
 6. Audit: A formal independent examination with intent to verify conformance with established requirements (ANSI N 18.7 (1976))

II. GENERAL GUIDANCE

The plant technical specifications (section 6.0) describe the responsibilities of the NSRB for safety review and cognizance of audits. In reviewing the subjects associated with the fulfillment of these responsibilities, NSRB members, alternates, and consultants shall (when appropriate based on the nature of the subject):

1. Be alert for items for which the NSRB should meet promptly to discuss
2. When reviewing changes to the facility or procedures, or when reviewing tests or experiments, be alert for a possible unreviewed safety question

3. Be alert for trends, generic concerns, and common failure modes which might lead to future conditions adverse to nuclear safety
4. Be watchful for evidence that administrative control systems are not functioning or being implemented properly, or are being circumvented
5. Be attentive to the possible need for a consultant or consultants (see POWER-NSRP 1.3, Use of Consultants). Consultants should be seriously considered if it is felt that the subject is potentially significant with respect to nuclear safety and the appropriate expertise is not represented in the NSRB
6. Be satisfied that, to the best of one's knowledge, a TVA-produced document is technically correct and complete
7. Be satisfied that a TVA-produced document has been prepared, reviewed, and approved in accordance with established procedure

In addition, NSRB members shall also be watchful during the normal performance of their TVA duties for significant conditions or circumstances which should be brought to the attention of the NSRB.

III. REGULAR REVIEW SUBJECTS TRANSMITTED FOR INDIVIDUAL REVIEW

This specific guidance is presented in the form of typical questions the reviewer should ask himself during his review. The responses to these and any other questions that the reviewer formulates for himself will be based on his knowledge and judgment and will dictate his course of action (e.g., comment to be resolved or no comment).

Reviewer comments on documents transmitted for his review should be substantive and self-contained. Comments should not be formulated in the form of a question, but rather as one or more statements which convey his concern.

1. NRC-IE Originated Documents
(Information Notice, Circular,
Bulletin, Inspection Report)

2. TVA Responses to Item 1

1. Should TVA treat the item on a higher level of priority than that given by NRC? Could the item have a wider range of applicability than stated by NRC? If the item does not require a TVA response, should the NSRB review the NERP review? Do we have a SAR commitment related to the item?
2. Is the TVA reply completely responsive to the NRC? Is there any evidence from the response that it may not have been coordinated properly in TVA? Are commitments in the response important enough to be audited? For partial response, is the schedule given for full response acceptable in view of nuclear safety and continued operation of the plant? Is the response adequate to justify continued operation of the plant? In light of the response, should technical specifications be revised? Is the corrective action given in response to inspection findings adequate?

3. RO, Deficiency, 10 CFR 21
Report, Reviews of RO's

3. Is the report factual? Are the descriptions of the cause and the analysis of the occurrence complete? Does the occurrence represent possible generic problems (plant-wide or TVA-wide)? Does the occurrence represent possible common-mode failures that could jeopardize nuclear safety?

Is the corrective action adequate for the short term and long term? Is the corrective action appropriate, accurate, and complete? Was the item reported within an appropriate timeframe? Should the corrective action commitments be audited? Does 10 CFR 21 apply?

4. PORC Minutes and Reports

4. Does PORC appear to be meeting its technical specification requirements? What are the specific items of concern or items of disagreement within PORC? Are the minutes and reports complete enough for NSRB understanding?

5. Audit Schedules, Reports, Followups, and Responses

5. Are audits scheduled on a frequency commensurate with their safety significance and as required by the technical specifications?

Should NSRB consider direct involvement in selected audits? Should NSRB provide input to auditors regarding scope and/or details? Are audit findings appropriately classified with regard to nuclear safety? Should more frequent follow-up be undertaken? Is proposed corrective action adequate and complete? Is audited organization being responsive to significant deficiencies? Can deficiencies be considered significant conditions adverse to quality or as noncompliances under 10 CFR 21? Is the finding a violation of procedures or a potential technical specification violation?

(Note that not all technical specification violations are reportable. Those of technical specification section 6, for example, are generally not reportable).

6. License or Technical Specification Change

6. Is the safety analysis still valid with this change? Is the NRC safety evaluation correct and complete? Will the change affect TVA procedures and should these procedures be audited for conformance?

7. Safety evaluations or unreviewed safety question determinations (e.g., changes to procedures, DCR-Core Component, STEAR, CCOSE, TAF, modifications)

7. Is the item correctly identified (safety or non-safety)? Will the new configuration be within the bounds of the plant safety analysis? Is the ECN cover sheet complete (if an ECN is involved)? Are the requirements of 10 CFR 50.59 met? Are justifications given for the responses to the 10 CFR 50.59 questions? Are the justifications complete and accurate? Have the appropriate administrative approvals been obtained? Should compliance with any special condition, prerequisites, or requirements be audited or otherwise verified?