

TENNESSEE VALLEY AUTHORITY
EMPLOYEE CONCERNS TASK GROUP

PROCEDURE ECTG M.2

PROGRAM PLAN

FOR

SWEC AND NSRS ISSUES

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PROGRAM PLAN FOR
SWEC AND NSRS ISSUES

1.0 PURPOSE AND SCOPE

- 1.1 To define the requirements and methodology for the Employee Concerns Task Group (ECTG) evaluation and resolution of the following issues:
1. Issues identified in the Stone & Webster Engineering Corporation (SWEC) prepared "Systematic Analysis of Identified Concerns/Issues at TVA" (referred to as SWEC issues).
 2. Open issues identified as a result of TVA Nuclear Safety Review Staff (NSRS) investigates actions (referred to as NSRS "classical" investigations).
- 1.2 This plan includes requirements for: verification of the acceptability of previously committed corrective actions; verification of completion of corrective action; evaluation and resolution of issues for which corrective action is currently undefined or for corrective action which is defined but has not yet been accepted; approval of corrective action; documentation of results; and, closure of issues.
- 1.3 This program shall include:
- a. Sorting of issues into logical and manageable groups, where possible.
 - b. Training of individuals involved in the evaluations performed under this program.
 - c. Determination of safety classification.
 - d. Determination of potential for generic applicability to other TVA nuclear plants and office locations as well as to other items, systems, or processes within any one plant to ensure evaluation for applicability.
 - e. Determination of validity and the need for corrective actions and notification of responsible management.
 - f. Identification of root causes and approval of the actions necessary to correct deficient conditions and to preclude their recurrence.
 - g. Tracking, verification, and closeout of the corrective actions.

- h. Generation and retention of sufficient records to provide auditable evidence of the adequacy of the logic and rationale that provided the basis for judgments made during the evaluation process that support findings and conclusions provided in the program's reports.

2.0 REFERENCES

- 2.1 Employee Concerns Task Group Program Manual
2.2 ECSP Reports Writer's Guide

3.0 ORGANIZATION AND RESPONSIBILITIES

Note: Any responsibilities identified herein as being assigned to a specific-titled individual may be delegated by that individual to another qualified individual within the same organization. However, delegation of one's responsibility(s) does not relieve one of the ultimate responsibility for the assigned activity.

The TVA Manager of Nuclear Power has established the ECTG and the Senior Review Panel (SRP), consisting of nuclear industry experts, to provide an oversight role. Attachment A of reference 2.1 provides an organization chart depicting the ECTG organization. Attachment B of reference 2.1 provides the charter for the SRP. In addition to TVA employee concerns, the TVA Manager of Nuclear Power has assigned other issues, as identified in Section 1.0 of this plan, to the ECTG in order to utilize available resources and procedures for their evaluation and resolution.

- 3.1 The ECTG Program Manager is responsible for the following:
- ° Establish within the ECTG the personnel responsible for evaluation and resolution of those items within the scope of this plan.
 - ° Execute the plan through implementation of appropriate procedures and other written directives as necessary.
 - ° Review and approve the reports prepared to close SWEC issues and NSRS issues within the scope of this plan.
 - ° Ensure the adequacy of records generated or used to substantiate the implementation of this plan.

- Review and concur with the corrective actions prepared by responsible site directors and other responsible TVA managers.
- Keep the site directors and other responsible TVA management apprised of the status of evaluations.

3.2 Site directors are responsible for the following:

- Establish, in conjunction with the ECTG, the priorities for evaluation within the overall TVA priorities provided by the TVA Manager of Nuclear Power
- Review reports and prepare corrective action plans as requested.
- Initiate QA program deficiency documents for any identified quality-related deficiencies.
- Implement corrective actions after concurrence of the ECTG.
- Notify the ECTG (or the on-going ECP site representative if the ECTG is disbanded) upon completion of corrective actions.

3.3 Other Responsible TVA Managers

Other responsible TVA managers with identified responsibility for correcting identified deficiencies are responsible for review of reports and for planning and taking appropriate actions.

3.4 Division of Nuclear Quality Assurance

The Director of Nuclear Quality Assurance (DNQA) is responsible for auditing the implementation of this program. audits shall be conducted, documented, and followed up in accordance with approved audit procedures which comply with the requirements of the Nuclear Quality Assurance Manual.

3.5 Within the ECTG the "Other Site" Category Evaluation Group Head (CEG-H) has been assigned responsibility for implementing the requirements of this plan and has overall responsibility for the resulting evaluations and reports and for:

3.5.1 Verifying the acceptability of existing corrective action which address SWEC issues and NSRS issues within the scope of this plan.

- ° Stone & Webster Engineering Corporation (SWEC) "Systematic Analysis of Identified Concerns/Issues at TVA," and the
- ° Nuclear Safety Review Staff (NSRS) during the course of their classical investigations and reviews that are still open.

3.5.2 Conducting evaluations as required within the scope of this plan and close SWEC issues and NSRS issues for which corrective action has not yet been specified or approved.

3.5.3 The other sites CEG-H is also responsible for the following:

- ° Conduct or arrange for the training and verify the qualifications and (to the extent required) independence of assigned personnel.
- ° Determination of generic applicability.
- ° Evaluation of the acceptability of corrective actions taken to resolving the SWEC and NSRS issues.
- ° Determination of the cause(s) of open issues.
- ° Identification of the need for remedial corrective actions and actions to preclude recurrence for findings.
- ° Verification of the initiation of appropriate plant deficiency documents by responsible line management as a part of their planned corrective action responses to quality-related concerns.
- ° Generation or compilation of records to provide auditable evidence of the adequacy, logic, and rationale that provided the basis for judgments (findings) made during the evaluation process.
- ° Review of and concurrence with corrective action responses prepared by responsible line management.

- Verification, followup , tracking, and closeout of corrective actions that are not safety-related up to the time that the ECTG is disbanded. Those nonquality-related corrective actions still remaining open at that time shall be appropriately transferred to the ongoing Employee Concerns Program Manager for verification, followup , tracking, and closeout.
- Provide input to the computerized data base for identified employee concerns.
- Perform assigned program tasks within established schedules.
- Maintain that the ECTG Program Manager is apprised of the status of the evaluations and reports.
- Concur with SWEC and NSRS Closure Reports prepared by evaluators.

3.6 Program Control & Administration (PC&A) Staff

The PC&A Staff reports to the ECTG Program Manager and consists of two sections, the Technical Assistance Staff and the Administrative Staff. They are responsible for:

- Evaluator training
- Control of sensitive files

4.0 DEFINITIONS

- 4.1 Issue - an individual statement raised by NSRS or contained in the report prepared by SWEC that is considered still open until ECTG assesses the adequacy of the corrective actions taken to resolve the issue
- 4.2 Complete - a term used to reflect that the corrective action taken by (or proposed if not completed) by the line for ECTG to close the issue. However, for SWEC issues the issue cannot be officially closed by TVA until it is formally closed by the auditing or inspection agency.

5.0 PROGRAM PLAN

As part of its evaluation responsibility, the ECTG was assigned closure responsibility for open NSRS recommendations and issues identified as a result of the Stone and Webster Engineering Corporation (SWEC), "Systematic Analysis of Identified Concerns/Issues at TVA." This program plan defines those activities required to ensure that SWEC issues and NSRS issues within the scope of this plan have been addressed and adequately resolved.

- 5.1.1 Review issues and group them by plant.
- 5.1.2 Review issues in each subcategory and group them into similar areas (elements) using the general criteria of Attachment G of reference 2.1, applied on an element level.
- o Similar issues constitute an element. Verification will be performed at this level.

- All similar elements constitute a subcategory. The verification analysis report will be prepared at this level and will summarize results of the element verifications.
- 5.1.3 Define each element for each project in such a fashion as to facilitate a resolution to the identified issues and lead to "root cause," corrective actions if necessary.
- 5.1.4 Prepare an overall Verification Evaluation Plan (VEP) for verification of those issues identified by SWEC and for the NSRS issues within the scope of this plan.
- 5.1.5 The written evaluation plan for each project should include the following items:
- A description of the perceived problem(s).
 - A list of similar issues that can be grouped for verification to improve the efficiency of the verification process.
 - A list of source, background, and historic information that should be considered.
 - A description of the general methodology that should be followed during the verification process.
 - Staffing needs and schedules for accomplishing the verifications and preparing the evaluation reports.
- 5.1.6 Verifications will be performed using the VEP as a guide. A case file is to be maintained for each element evaluation. This file shall contain the following format:
- SWEC K-Z form or NSRS concern
 - Baseline references, including titles, number identification, subjects and dates of procedures or correspondence reviewed.
 - Chronology of verification log which includes by date, equipment numbers and locations of equipment observed or inspected, identification and results of any process observed, discussions held with cognizant personnel, and procedures and instructions reviewed.

- Contacts list, including names, dates, positions and results of personnel interviews (anonymity shall be afforded when specifically requested).
- Findings, references, including titles, number identification, subjects, and dates of procedures or correspondence reviewed.
- Copies of key reports and any nonconformance and corrective action documents generated as a result of the verification finding.

5.1.7 During the verification process, any immediate actions or nonconforming items identified or any incidences of individuals either divulging themselves as the concerned individual or inhibiting the evaluation process will be reported to the CEG-H and handled according to ETCG C.2 of reference 2.1.

5.1.8 Notify the CEG-H and refer to ETCG C.2, reference 2.1, as appropriate for additional information regarding instances involving intimidation and harassment.

5.1.9 In cases where the evaluator may be personally involved, either directly or indirectly, in a raised NSRS or SWEC issue, the evaluator shall withdraw from involvement in the evaluation of the concern. This withdraw shall be in writing to the CEG-H and included in the appropriate case file(s).

Note: In cases where more than one evaluator is responsible for performing an evaluation, the specific evaluation methodology section of the evaluation report shall identify the separate areas of responsibility and each evaluator will sign the evaluation report. The evaluators may decide to prepare separate evaluation reports for the different areas of responsibility. In these cases, each evaluator's report will clearly define the scope of responsibility and shall reference the other report. These separate evaluator reports and their case files will be labeled "A", "B", and etc., in addition to the number assignments described in 7.3.1.5.

5.1.10 For SWEC issues, the following verification methodology should be employed.

- Pull all RIMS documentation numbers identified for the particular group of SWEC issues being verified.
- Review material acquired and develop a VEP as a guide.
- Utilize the compliance licensing and Plant Operations Review Staff (PORS) tracking systems, as available, to identify actions taken to resolve the issue. If compliance or PORS verifies the corrective actions taken by the line, the tracking system may be taken as a valid mechanism for corrective action tracking closure.
- For NRC-related issues, utilize the NRC resident inspectors tracking system to ensure issues had not been prematurely closed or to discover inconsistencies in the corrective action status. This NRC system will also identify which NRC follow-up report closed the action item if a final resolution document is not discovered within the line's tracking system.
- Verify the actual corrective action status to assure that each issue has been satisfactorily addressed. The degree of verification is subject to the evaluator's confidence of corrective action implementation and to the severity of the issue.

5.1.11 For NSRS issues, the following verification methodology should be employed:

- Pull the parent document of the open NSRS issue.
- Review the details section of the report for the specifics surrounding the NSRS conclusions for the associated recommendation being verified.
- Review all line correspondence on the issue.
- For issues which are clear cut, verify corrective actions have been taken and prepare a closure statement for the issue.
- For issues which have been open between the line and NSRS, prepare a resolution package detailing the history of the conflict and corrective actions taken or proposed. The final resolution of this issue will then be made by the Office of Nuclear Power Manager.

- 5.1.12 For any discrepant conditions determine the perceived root cause based on the information and observations noted during the verification phase.

Note: The actual root cause may not be possible to determine because of restrictions encountered because of a limited amount of information available. Symptomatic issues should be noted, however, for review on the subcategory evaluation level.

- 5.1.13 Submit the verification findings to the CEG-H for concurrence.

6.0 REPORTS

- 6.1 Evaluation reports should be prepared by the evaluator using as a minimum the information contained in reference 2.2 for element or subcategory reports as appropriate.
- 6.2 The CEG-H will assign a CEG member to perform an independent technical review after completion of each element verification report.
- 6.3 The individual developing the report will summarize all findings, determine generic applicability in accordance with Attachment F of ECTG M.1 (reference 3.1) and address any actions necessary to prevent recurrence. The logic and rationale for root cause determination of identified deficiencies shall be identified in the specific evaluation methodology section of the report.
- 6.4 The CEG-H will submit the completed reports to the ECTG Program Manager for review and approval and subsequent concurrence by the SRP.

Note: The approved report will be transmitted to the applicable organizations by the PC&A Staff for determination of corrective actions and reportability requirements.

- 6.5 The CEG-H shall evaluate the line proposed corrective actions for acceptability and incorporate acceptable responses as a permanent part of the report.
- 6.6 The CEG-H will track the closeout of nonsafety-related corrective actions in the ECPS data base in accordance with ECTG A.3 of reference 2.1. The status of corrective actions will be identified in the category report and corrective actions not completed at that time will be transferred to the ECTG Program Manager for tracking. Corrective action of safety-related items will be tracked by the controlling procedures for the nonconformance or corrective action document.

7.0 DATA ANALYSIS AND CORRECTIVE ACTION DETERMINATION

- 7.1 Analysis and corrective action determination must be performed based on the information and observations noted during the evaluation phase.
- 7.2 Determine the root cause problems for deficiencies noted during the evaluation process.
- 7.3 Immediate corrective actions should target only safety-significant deficiencies. Long-term corrective actions should target root cause deficiencies to prevent recurrence of either real or perceived concerns.
- 7.4 Submit the evaluation findings to the CEG-H for concurrence.
- 7.5 Once the findings and any corrective actions proposed by line management are acceptable to the CEG the issue is considered closed by the ECTG.

8.0 DOCUMENTATION

- 8.1 Evaluation Training and Certification Records will be maintained as a package.
- 8.2 Evaluator logs (handwritten notes) will be maintained with the respective element evaluation reports.
- 8.3 Final Reports will be maintained as lifetime records.

ENCLOSURE 4