

TENNESSEE VALLEY AUTHORITY

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JUN 05 1990

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)	Docket Nos.	50-259	50-390
Tennessee Valley Authority)		50-260	50-391
)		50-296	50-438
)		50-327	50-439
)		50-328	

TVA NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A, REVISION 0) - PROPOSED CHANGES

The changes to TVA's Nuclear Quality Assurance Plan (Plan), provided as an enclosure, are submitted in accordance with the requirements of 10 CFR 50.54(a)(3) and 10 CFR 50.55(f)(3). These changes are in regard to:

- A. The commitment to American National Standards Institute (ANSI) N45.2.6-1978, as endorsed by NRC Regulatory Guide 1.58, Revision 1;
- B. Section 9.4.2.3.h. of the Plan on Test Control; and
- C. The commitment to Regulatory Guide 1.64, Revision 2.

Items A and B provide clarifications of the Plan and do not reduce commitments previously accepted by NRC. Accordingly, these changes will also be submitted in TVA's annual Plan update. Item C describes an alternative to an NRC Regulatory Guide commitment contained in the Plan and is submitted for NRC approval.

The above changes were discussed with Jack Donohew, NRC, OSP. If you have any questions, please telephone F. L. Ginn at (615) 751-7667.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark O. Medford, Vice President
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Enclosure
cc: See page 2

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Enclosure

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ENCLOSURE

NQA PLAN CHANGES

- A. The existing approved NQA Plan in reference to ANSI N45.2.6-1978 (refer to Appendix B, page 96 of 112 of the subject document) reads as follows:

Present wording:

1. Personnel performing preoperational testing or survey party chiefs are not within the scope of this Regulatory Guide.

Clarify to read:

1. TVA complies with Regulatory Position C.1 of this Regulatory Guide, as follows:
 - o Construction testing personnel are qualified to Regulatory Guide 1.28 (ANSI N45.2).
 - o Operations, maintenance, and modification testing personnel are qualified to Regulatory Guide 1.8 (ANSI N18.1) as endorsed in App. B of this Plan.
 - o NQA inspection personnel are qualified to ANSI N45.2.6.

Justification for Clarification:

Regulatory Guide 1.58, Regulatory Position C.1 provides this flexibility for the applicability of ANSI N45.2.6 with regard to testing personnel.

Present Wording:

2. TVA determines initial capability from the following criteria as defined in procedures: candidate's education, experience, training, examination, and/or capability demonstration. On-the-job participation in the work discipline is required for all candidates.

Change to read:

Delete this alternative.

Justification for Change:

Because these criteria are already specified in ANSI N45.2.6, section 2.2, their restatement as an alternative is unnecessary.

- B. The existing approved NQA Plan in reference to Test Control (refer to Section 9.4.2B.3h, page 55 of 112 of the subject document) reads as follows:

Present wording:

- h. Outstanding CAQs have been identified and evaluated for potential impact on test results.

Clarify to read:

- h. CAQs are corrected, or are evaluated and determined not to adversely impact testing, prior to the initiation of preoperational testing of the affected item.

Justification for Clarification:

During resolution of NRC's request for additional information on the subject document (reference TVA letter from M. J. Ray to the NRC dated December 7, 1989) concerning the test program, TVA inadvertently left out the words in the QA Plan stating, "prior to the initiation of preoperational testing of the item." These words have now been included in the text and the statement has been clarified to indicate that in some instances CAQs may have been corrected.

- C. The existing approved NQA Plan in reference to Reg. Guide 1.64, Rev. 2 (refer to Appendix B, page 96 of 112 of the subject document) reads as follows:

Present wording:

- o The NQA Plan follows this guide.

Change to read:

The NQA Plan follows this guide with the following alternative to regulatory position C.2.

If in an exceptional circumstance, the engineer's supervisor is the only person technically qualified to perform the review, the design verification review will be conducted by the supervisor, provided that:

1. The other provisions of the Regulatory Guide are satisfied.
2. The justification is individually documented and approved in advance by the supervisor's management.
3. Quality Assurance will audit the use of supervisors as design verifiers to guard against abuse.

Justification for Change:

Design verification is an in-depth review of all aspects of the engineering package by independent reviewer(s). The independent reviewer(s) should have sufficient technical background and experience to provide an objective and credible verification of the design and should not be involved during the development of the design. In some complex designs, only a limited number of individuals are capable of providing a credible verification. In limited cases, the only individual that has the necessary technical background and experience to provide for an adequate design verification of engineering packages is the engineer's supervisor. In these cases, the supervisor would be allowed to perform the design verification provided the supervisor did not specify a singular design approach or rule out certain design considerations and did not establish the design inputs used in the design. Details for design verification reviews of design inputs are specified in Sections 7.2.2 and 7.2.6 of the NQA Plan.

For the reasons expressed above, it is TVA's position that the Plan, as amended by this change in commitment to Regulatory Guide 1.64, Rev. 2, meets the requirements of 10 CFR 50 App. B and the plan commitments previously accepted by NRC.