

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

August 1, 1984

BLRD-50-438/84-22, WBRD-50-390/84-14
BLRD-50-439/84-21, WBRD-50-391/84-14

U.S. Nuclear Regulatory Commission
Region II

Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

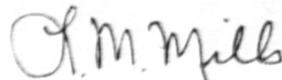
WATTS BAR AND BELLEFONTE NUCLEAR PLANTS UNITS 1 AND 2 - RETRIEVABILITY OF
QUALITY ASSURANCE RECORDS BLRD-50-439/84-22, BLRD-50-439/84-21 AND
WBRD-50-390/84-14, WBRD-50-391/84-14 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector
R. Carroll on March 1, 1984 in accordance with 10 CFR 50.55(e) as NCR GEN
QEE 8401. This was followed by our interim report dated March 29, 1984. A
similar condition was subsequently documented as NCR DD1-A-84-0001-D05. A
several days delay of this submittal was discussed with Inspector S. Wise
on July 31, 1984. Enclosed is our final report on both NCRs.

If you have any questions, please get in touch with R. H. Shell at
FTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Licensing

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Records Center (Enclosure)
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

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WATTS BAR AND BELLEFONTE NUCLEAR PLANTS UNITS 1 AND 2
RETRIEVABILITY OF QUALITY ASSURANCE RECORDS
BLRD-50-438/84-22, BLRD-50-439/84-21
WBRD-50-390/84-14, WBRD-50-391/84-14
NCRs GEN QEB 8401 AND DD1-A-84-0001-D05
10 CFR 50.55(e)
FINAL REPORT

Description of Deficiency

10 CFR 50 Appendix B, Criterion XVII, and ANSI N45.2.9 specify the requirements for the handling of quality assurance (QA) records by the holder of a construction permit and a licensee. TVA's Program Requirements Manual (PRM) is TVA's upper tier document that delineates the scope of TVA's program responsibilities relative to these regulatory requirements. Specifically, the PRM section 17 QPR-1, requires that a records index and retrieval system be developed that is compatible with TVA's Divisions of Construction (CONST) and Nuclear Power (NUC PR) requirements to assure that supplier quality control records are identifiable and retrievable. TVA's Division of Engineering Design (EN DES) Quality Engineering Branch (QEB) is responsible for supplier quality control records on those contracts in which QEB inspection is specified. During the active phase of these contracts, the supplier quality control records are temporarily stored by QEB. After completion of the contract, QEB arranges for the microfilming of the records and their transfer to permanent storage.

A Nuclear Safety Review Staff (NSRS) investigation of concerns regarding QEB records (NSRS Report I-83-13-NPS) revealed that the commitments identified in the PRM have not been fully carried out. Although the records are available, they are not indexed to a degree that provides easy retrieval by organizations outside QEB. Also, there has been no transfer of records for completed contracts to permanent storage.

Safety Implications

The inability to readily retrieve QA records pertinent to safety-related components or designs could hinder the evaluation of potential deficiencies relative to the affected components or designs. In addition, the significance of this deficiency with regard to compliance with 10 CFR 50 Appendix B requirements and, more directly, the health and safety of the public are not certain. Consequently, the condition is judged to be indeterminate and, as such, could adversely affect the safe operation of the plant.

Corrective Action

NUC PR has provided a list of the type of vendor records needed for operation and maintenance of nuclear plants and their retrievability requirements. Interdivisional Quality Assurance Procedures (ID-QAPs) 17.1 and 17.2 were revised on June 8, 1984, to incorporate these requirements with regard to the handling of supplier quality control records on those contracts in which QEB inspection is specified.

QEB Engineering Procedure (EP) 24.37, "Product Compliance Data and Quality Engineering Records - Processing and Disposal," has been revised to provide a system which meets regulatory requirements and NUC PR needs for the indexing, storage, and retrieval of supplier quality control records on contracts in which QEB inspection is specified. This system was placed in operation on March 19, 1984, and the procedure was processed and issued June 22, 1984.

Formal training of QEB employees in the requirements of QEB-EP 24.37 will be completed by November 5, 1984.