

September 3, 1985

To Bill Dircks, ✓ Carl Kammerer
From Henry Myers *hm*

Re: Watts Bar Q List

On May 16, 1985, the NRC Director of Licensing sent the TVA Manager of Power and Engineering a list of questions concerning TVA's adherence to NRC regulations. Item 5 (based on Concern #6) in the May 16 letter sought information related to TVA's compliance with Criterion II, Appendix B, 10 CFR 50:

...identify the documents that demonstrate your compliance with Criterion II, Appendix B, 10CFR Part 50, for maintaining a Q list from the date of the construction permit (CP).

Among other things, Criterion II states:

"The applicant shall identify the structures, systems and components to be covered by the quality assurance program and the major organizations participating in the program, together with the designated functions of these organizations. The quality assurance program shall provide control over activities affecting the quality of the identified structures, system, and components, to an extent consistent with their importance to safety."

On June 5, TVA responded to the May 16 letter. The response to Item 5 (Concern #6), which did not provide the documentation sought by the NRC the May 16 letter, states:

Presently, TVA has one Q list for WBN (Watts Bar). This Q list is used by all TVA organizations to identify safety-related structures, systems, and components whose quality-related activities are to comply with 10 CFR 50, Appendix B requirements.

.....

Since the issuance of the WBN CP, TVA has continually complied with this requirement by identifying the SSC to be covered by the QA program on design drawings. SSC have been classified according to their importance to safety. The classification of each SSC has been documented on design drawings.

The June 5 response did not state that TVA has complied with Criterion II by maintaining a Q list.

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NSRS [Report R-81-14-OEDC(BLN)-20] found, according to R-84-32-NPS) that:

EN DES failed to develop a single controlled comprehensive listing of safety-related systems and components for BLN.

NSRS Report R-82-02-WBN-07 found that:

There were many differences between the EN DES defined list of QA valves and the CONST defined list of QA valves.

NSRS Report R-82-2-WBN-09 found that:

There was not a comprehensive controlling list of safety-related structures, systems, and components, nor was there a program to control such a list.

TVA's June 5 response, which does not address the findings in the above referenced NSRS reports, described continuing efforts to comply with Criterion II. TVA stated that in January, 1983:

TVA's design organization released the first 'trial use' Q list for WBN. TVA decided to allow 12 month's trial use and review by TVA's organizations prior to its approval and issuance. During this period, the TVA design and construction organizations reviewed the Q list against other TVA drawings and specifications and the construction accountability lists. This review verified that the construction accountability lists were complete in their identification of SSC that required QA coverage. Q list errors and omissions were identified and corrected during this trial use period.

NSRS Report R-84-32-NPS, issued January 16, 1985, described the current status of these findings from R-81-14-OEDC(BLN) and R-82-02-WBN:

The Office of Quality Assurance closed this item for Watts Bar, but left it outstanding for the BLN program. ... Action to achieve agreement among ONP, OC, and OE on the Q-list and its implementation for Watts Bar was scheduled to be taken prior to receipt of an operating license for Watts Bar in accordance with a commitment made to the NRC on November 28, 1984.

Also in January 1985, according to TVA's June 5 response to the NRC, TVA issued an instruction "to implement the Q List. At that time, the CSSC list was deleted from the NUC PR WBN site QA program."

At present, according to TVA's June 5 response,

TVA is "reviewing the Q list against the old CSSC list to ensure that the CSSC list had been complete when in use, i.e., that it had appropriately identified the SSC requiring QA coverage. Since both lists originated from the same source, i.e., design drawings and construction specifications, we anticipate that this review will verify that the CSSC list had been adequate. All TVA organizations associated with WBN presently use the TVA WBN Q List to identify SSC requiring QA coverage."

QUESTIONS

1. Does NRC staff believe the June 5 response to Item 5 (concern #6) was an adequate response to the NRC's request for documentation?
2. Did TVA's method of identifying on design drawings the SSC to be covered by the QA program satisfy the Appendix B requirements?
3. If the TVA method of identifying on design drawings the SSC to be covered by the QA program satisfied NRC requirements, what reviews and/or audits were conducted by TVA to determine whether procurement of safety related items was carried out in a manner so that safety related items were in fact qualified to perform their intended function?
4. What reviews have been conducted by NRC to determine whether TVA complied with Criterion II? Did such reviews track Q List deficiency findings (such as those enumerated by NSRS) and corrective actions thereto? Has NRC reviewed the documents prepared in response to the NSRS findings? Where are such NRC reviews documented?
5. Has NRC evaluated the NSRS review which, according to NSRS R-84-32-NPS, led to R-82-02-WBN-07 and 09 being "closed for record and tracking purposes?" Where is any such NSRS review and NRC evaluation documented?
6. Has NRC reviewed its own inspection findings, TVA responses thereto, and other communications with TVA concerning the Q List issue? Where is such review documented?

September 9, 1985

To Bill Dircks, Carl Kammerer
From Henry Myers ^{MM}

Re: TVA

The September 6 meeting between NRC staff and TVA suggests the following questions and comments:

1. What did NRC staff learn from the September 6 meeting that could not have been learned from a written report? What was the outcome of the meeting by way of clarifying issues or establishing the NRC's position on the issues?
2. Why did NRC staff not ask TVA and its contractors to discuss during the September 6 meeting the most significant findings of ongoing reviews of TVA's nuclear facilities?
3. TVA has certified in the past that recently discovered noncomplying conditions did in fact not exist. What is the staff's response to concerns expressed in the September 6 meeting that the same people, who previously certified compliance with NRC regulations, are currently responsible for certifying that noncomplying conditions have been identified and corrected?
4. In light of problems revealed by recent reports prepared by INPO, NSRS, Westec and QTC, what is the staff's understanding as to the basis for previous certifications that Watts Bar had been designed and constructed in accord with NRC regulations and TVA commitments?
5. What reviews has NRC conducted of the recent findings of INPO, NSRS, Westec, and QTC? Where are such reviews documented?
6. It appears that TVA believes the principal task remaining prior to certification of Watts Bar readiness for licensing is completion and disposition of inquiries into allegations of harassment and intimidation. Does NRC staff agree with TVA that this remains the principal task? If so, what analyses or reviews has NRC conducted to provide the basis for such agreement? Does NRC staff perceive any issue that might obstruct issuance of a Low Power Operating License to Watts Bar 1 prior to February 1986? If NRC staff does not perceive any such issue, given reports referred to elsewhere in this memorandum, what reviews or analyses have been conducted to support this perception?
7. What is the status of the staff's review of the structural steel welding issue? What is the staff's position regarding the QTC findings regarding the carbo zinc issue?

8. What inquiries are underway to determine why NRC staff were not fully informed in early 1984 of significant facts concerning questions raised within TVA about the adequacy of TVA's structural steel welding program?
9. What is the NRC staff's position regarding findings in the July 8, 1985 NSRS report regarding cable installation procedures (I-85-06-WBN)?
10. What is the NRC staff's position regarding findings in the March 8, 1985 NSRS report regarding procurement QA (R-84-17-NPS)?
11. Does the recent Westec report conflict with previous submissions from TVA with regard to environmental qualification?
12. What is the NRC staff's position on TVA's plan to correct deficiencies that have come to light in recent reviews by INPO, NSRS, Westec, and QTC?