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NOV 14 1986

Mr. Brian K. Grimes, Director
Divison of Quality Assurance, Vendor,
and Technical Training Center Programs
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Grimes:

Enclosed is TVA's response to your letter dated August 1, 1986 to R. L. Gridley which requested additional information concerning Revision 9 to TVA's Topical Report, TVA-TR75-1A, "Quality Assurance Program Description for Design, Construction, and Operation of TVA Nuclear Power Plants." Enclosure 1 provides a compilation of responses to each NRC question. Enclosure 2 provides revised pages reflecting each response incorporated into the Topical Report and is submitted as Revision 9, Draft 2.

If you have any questions concerning this matter, please get in touch with D. L. Lambert at (615) 751-2733.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

C. C. Mason
Acting Manager of Nuclear Power

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A004
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TVA QA TOPICAL

REQUEST FOR ADDITIONAL INFORMATION (SRP)

1. (1A5) Identify the "onsite" and "offsite" elements which function under the cognizance of the QA program. Provide a description of the criteria for determining the size of the QA organization including the inspection staff. (D&C, Ops.)*

RESPONSE: Organization charts revised to show onsite/offsite elements. 17.0.5 revised to describe how size of the QA organization is determined.

2. (1B6) Describe measures to assure designated QA individuals are involved in day-to-day plant safety-related activities (i.e., the QA organization routinely attends and participates in daily plant work schedule and status meetings to assure they are kept abreast of day-to-day work assignments throughout the plant and that there is adequate QA coverage relative to procedural and inspection controls, acceptance criteria, and QA staffing and qualification of personnel to carry out QA assignments). (D&C, Ops.)

RESPONSE: 17.0.5.3 revised to describe the Site Quality Manager's involvement in day-to-day plant activities.

3. (2A1c) Describe measures which assure that the development, control, and use of computer code programs will be conducted in accordance with the QA program and a description of how the QA program will be applied. Include a description for certifying for use of verified computer codes. (D&C, Ops.)

RESPONSE: The introduction, 17.1.3, 17.1.3.3.1, 17.1.16.1, and 17.2.16 have been revised to show that safety-related computer codes and computer programs are subject to defined programmatic controls. These controls are defined by various divisions and staffs in their procedures and include requirements for preparation, review, approval, validation, control, and revisions. We have identified a need to standardize and improve the control of computer codes and computer programs. To this end, a new NQAM procedure is being prepared for issuance prior to Sequoyah startup. Procedural controls for computer programs will be expanded or revised as appropriate to comply with the NQAM. The controls will be implemented on a timetable consistent with the NQAM.

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*D&C = Questions applicable to design and construction phase

Ops. = Questions applicable to operations phase

4. (2A1e) Clarify whether special equipment, environmental conditions, skills, or processes will be provided as necessary. (D&C)

RESPONSE: 17.1.5 has been revised to indicate that instructions, procedures, and drawings include identification of special equipment and environmental conditions required to perform the activity.

5. Describe those additional quality assurance provisions to be incorporated in the QA Topical Report which give greater confidence and assurance that design, construction and operating activities will be carried out in accordance with the QA program commitments. Include in your response, the extent the quality assurance improvement controls described in the TVA Nuclear Performance Plan such as the Root Cause Analysis, the Corrective Action and Trend Analysis Programs, the Engineering Assurance Program, and the Operating Data Base and Performance Reporting Systems will be incorporated in the QA Topical. (D&C, Ops.)

RESPONSE: The quality assurance provisions of the Nuclear Performance Plan which have been accomplished to date are described in Revision 9. Examples include the restructured QA organization, the establishment of Engineering Assurance, and trend analysis and root cause analysis programs. The Topical Report will be revised in accordance with 10CFR50.54 to describe those additional programmatic enhancements when they are completed. These enhancements are tracked in a matrix maintained by DNQA to ensure their completion.

6. (2Dc,d,e) Clarify whether indoctrination, training, and qualification programs are established such that:

a. For formal training and qualification programs, documentation includes the objective, content of the program, attendees, and date of attendance. (D&C)

RESPONSE: Item (5) added to 17.1.2.3. to describe requirements for documentation of formal training programs.

b. Proficiency tests are given to those personnel performing and verifying activities affecting quality, and acceptance criteria are developed to determine if individuals are properly trained and qualified. (D&C, Ops.)

RESPONSE: 17.1.2.3 and 17.2.2.3 revised to describe requirements for proficiency testing.

c. Certificate of qualifications clearly delineates (a) the specific functions personnel are qualified to perform and (b) the criteria used to qualify personnel in each function. (D&C, Ops.)

RESPONSE: 17.1.2.3 and 17.2.2.3 revised to indicate that certifications indicate the functions that the certified personnel are qualified to perform and the criteria used for certification.

7. The NRC staff noted several key management positions in the TVA organization appear to be temporarily occupied by contractor personnel. Describe what steps you plan to take to insure when these key positions are vacated by the contractor personnel, that these positions will be filled with qualified and competent individuals. (D&C, Ops.)

RESPONSE: TVA has now placed TVA personnel in many of the key management positions. To complement these managers, the contractor personnel have been placed in an advisory capacity. A new management development program for ONP is under development and will be described in Revision 3 of Volume 1 of the Revised Nuclear Performance Plan.

8. (2B3) On sheet 8 of Table 17D-2 in Appendix D of the TVA QA Topical, there is no commitment to Regulatory Guide 1.144, Revision 1, 9/80, "Auditing of Quality Assurance Plan for Nuclear Power Plants." (Endorses ANSI N45.2.12-1977) for the operations phase. However, in Table 17D-1 of Appendix D, Regulatory Guide 1.144 is committed to for the Design and Construction phase. Justify why TVA has not committed to Regulatory Guide 1.144, Revision 1, 9/80. (Ops.)

RESPONSE: Commitment added to 17D-2.

9. (2B3) On sheet 9 of Appendix 17D-2, TVA has taken exception to Regulatory Guide 1.88, "Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records" by committing to NFPA-232-1980 instead of NFPA-232-1975. Neither NRC nor ANSI/ASME has endorsed NFPA-232-1980. Provide a commitment to

NFPA-232-1975 or describe the rationale as to why NFPA-232-1980 is justified. Should TVA wish to take exception to NFPA-232, it should be to NFPA-232-1975 with a description in equivalent detail to allow for review and evaluation. (Ops.)

RESPONSE: Table 17D-2 has been revised to provide a commitment to NFPA-232-1975 with some exceptions. The exceptions are desirable because NFPA-232-1975 does not allow any penetrations into the records vault for electrical or HVAC purposes. Allowances are made in the 1980 edition.

TVA is committed to performing fire load analysis. NFPA-232-1980 provides guidance for performing the fire load analysis which the 1975 edition does not have. Therfore, the 1980 version must be used to perform the analysis. There are no other substantive changes.

10. (3C1) Describe measures which assure that errors and deficiencies in approved design documents, including design methods (such as computer codes), that could adversely affect safety-related structures, systems, and components are documented, and action is taken to assure that all errors and deficiencies are corrected. (D&C, Ops.)

RESPONSE: 17.1.16 and 17.2.16 have been revised to show that errors and deficiencies in design documents are subject to the established corrective action system.

11. (3C2) Describe how deviations from specified quality standards are identified and procedures are established to ensure their control. (D&C, Ops.)

RESPONSE: 17.1.3 has been revised to indicate that these changes (deviations) are identified, approved, and controlled in accordance with established DNE procedures.

12. (17.2.3 #2) Describe measures to assure that responsible plant personnel are made aware of design changes/modifications which may affect the performance of their duties. (Ops.)

RESPONSE: Measures now described in 17.2.3.3.

13. (3D) Describe the internal and external design interface controls, procedures, and lines of communication among participating design organizations and across technical disciplines that are established for the review, approval, release, distribution, and revision of documents involving design interfaces to assure structures, systems, and components are compatible geometrically, functionally, and with processes and environment. (D&C, Ops.)

RESPONSE: Description added to 17.1.3.2

14. (3E4'b) Describe provisions which assure that design verification, if other than by qualification testing of a prototype or lead production unit, is completed prior to release for procurement, manufacturing, construction or to another organization for use in other design activities. In those cases where this timing cannot be met, the design verification may be deferred, providing that the justification for this action is documented and the unverified portion of the design output document and all design output documents, based on the unverified data, are appropriately identified and controlled. Construction site activities associated with a design or design change should not proceed without verification past the point where the installation would become irreversible (i.e., require extensive demolition and rework). In all cases, the design verification should be complete prior to fuel load for a plant under construction, or in the case of an operating plant, prior to relying upon the component, system, or structure to perform its function. (D&C, Ops.)

RESPONSE: 17.1.3.3 has been revised to indicate that design verification will be complete prior to fuel load, for a plant under construction, or prior to relying upon the item to perform its function, for an operating plant.

15. (4A1) Describe measures to assure that the review and documented concurrence of the adequacy of quality requirements stated in procurement documents is performed by independent personnel trained and qualified in QA practices and concepts. (Ops.)

RESPONSE: 17.2.4 has been clarified to indicate that DNQA personnel review all procurement documents.

16. (6A1) Section 17.2.6 on page 17.2.8 of the TVA QA Topical references Table 17B-5 for the major categories of controlled documents. Table 17B-5 appears to have been inadvertently omitted for the operations phase. As a minimum, the controlled documents in Table 17B-5 should include such documents as: (Ops.)

a. Design documents (e.g., calculations, drawings, specifications, analyses) including documents related to computer codes.

b. Procurement documents.

c. Instructions and procedures for such activities as fabrication, construction, modification, installation, test, and inspection.

d. As-built documents.

e. Quality assurance and quality control manuals and quality-affecting procedures.

f. Topical reports.

g. SAR.

h. Nonconformance reports.

RESPONSE: Table 17B-5 was inadvertently omitted; table has been included.

17. (6B1) Describe those measures established to assure that obsolete or superseded documents are removed and replaced by applicable revisions in work areas in a timely manner. (Ops.)

RESPONSE: Description added to 17.2.6.

18. (7A4) Describe measures to assure that procurement of spare or replacement parts for structures, systems, and components important to safety is subject to present QA program controls, to codes and standards, and to technical requirements equal to or better than the original technical requirements, or as required to preclude repetition of defects. (D&C)

RESPONSE: Description added to 17.1.4.1.

19. (7B4) Describe measures to assure that for commercial "off-the-shelf" items where specific quality assurance controls appropriate for nuclear applications cannot be imposed in a practicable manner, special quality verification requirements shall be established and described to provide the necessary assurance of an acceptable item by the purchaser. (Ops.)

RESPONSE: 17.2.4 has been revised to indicate that where it is impractical to impose appropriate quality assurance controls on the supplier, that DNE specifies quality verification requriements sufficient to ensure the adequacy of such items for use in nuclear applications.

20. Describe the controls established to identify and control consumable materials. (D&C, Ops.)

RESPONSE: "Consumables" added to the description in 7.1.8.1 and 17.2.8 to indicate that they are subject to the same controls as other materials.

21. (9A1) Describe the criteria for determining those processes that are controlled as special processes. (D&C, Ops.)

RESPONSE: Description added to 17.1.9 and 17.2.9.

22. (9A2) Identify, the organizational responsibilities including those for the QA organiztion, for qualification of special processes, equipment, and personnel. (D&C)

RESPONSE: Description added to 17.1.9.

23. (12.5) Section 17.2.12, item 5 on page 17.2-18 states that, "Unique identification numbers or other means are used to ensure direct traceability between calibration records and the affected instruments." Provide a description of what "other means" consists of. (Ops.)

RESPONSE: Control features for M&TE have been evaluated and it has been determined that reference to "other means" is not appropriate. This reference has been deleted.

24. (12.6, (12.7) When it is not possible to calibrate measuring and test equipment against standards that have an accuracy of at least four times the required accuracy of the equipment being calibrated, describe the basis to assure the equipment being calibrated will be within required tolerance and that the basis of acceptance is documented and authorized by responsible management. A calibrating standard with the same accuracy may be used if it can be shown to be adequate for the requirements, and the basis of acceptance is documented and authorized by responsible management. Identify the management authorized to perform this function. (D&C, Ops.)

RESPONSE: Revised description included in 17..12 and 17.2.12.

25. (17.1.13 #2) Describe the provisions established for the storage of chemicals, reagents (including control of shelf life), lubricants, and other consumable materials. (Ops.)

RESPONSE: "Consumables" added to the description in 17.2.13 to indicate that they are subject to the same programmatic controls as other items with regards to handling and storage.

26. (14.3) When it is necessary to bypass a required inspection, test, or other critical operation, describe the measures which assure such actions will be subject to the same controls as the original review and approval. (D&C)

RESPONSE: Description added to 17.1.14.

27. (14.4) Identify the organization responsible for documenting and identifying the status of nonconforming, inoperative, or malfunctioning structures, systems, and components to prevent inadvertent use. (Ops.)

RESPONSE: Description added to 17.2.14.

28. (17.3) Describe the QA organization's involvement in the documented concurrence and adequacy of the corrective action. (D&C, Ops.)

RESPONSE: Description included in 17.1.16.1, 17.1.16.2, and 17.2.16.

29. (17.3) Clerify whether inspection and test records contain the following where applicable: (Ops.)

a. A description of the type of observation.
b. The date and results of the inspection or test.
c. Information related to conditions adverse to quality.
d. Inspector or data recorder identification.
e. Evidence as to the acceptability of the results.
f. Action taken to resolve any discrepancies noted.

RESPONSE: Description added to 17.2.17.

30. (18B1) Describe provisions which assure that when audit data and resulting reports indicate any quality problems concerning the effectiveness of the QA program, the need for reaudit of deficient areas are reported to management for review and assessment. (Ops.)

RESPONSE: Description added to 17.2.18.

TVA QA TOPICAL

REQUEST FOR ADDITIONAL INFORMATION (10CFR & 50.54(a), 50.55(f)

CHAPTER 17.0

Revision 8, Paragraphs 17.0.2.1.3 (Sections 6 and 7) and 17.0.2.1.4 (Section 3) delineate training aspects.

Revision 9, Paragraphs 17.0.4, 17.0.5.4, and 17.0.5.5 delineate training.

(17.0 5&6)

1. How does the Director of Nuclear Training (17.0.4; "...training for the qualification of personnel who could affect the performance of safety-related items and activities.") interface with quality systems (17.0.5.4; "...establishing upper-tier requirements for selection, training, and certification of personnel performing quality assurance activities.") and technical support (17.05.4; "...implementation of qualification, training, and/or certification program for Quality Engineering, Quality Control, and Surveillance Personnel."). It is noted that no interface lines are shown.

   RESPONSE: The Quality Systems Branch establishes the programmatic requirements for training and documents these requirements in the NQAM. DNQA Technical Support Branch develops the qualification/certification program for DNQA inspection, surveillance, and quality engineering personnel. NQA&EB develops the qualification/certification program for QA auditors. The Nuclear Training organization develops lesson plans and conducts training classes in support of the above program requirements and procedures.

2. Who is ultimately responsible for qualification and certification of all qualilty related personnel and how is corporate making this system uniform at the three sites?

   RESPONSE: The ultimate responsibility for qualification and certification rests with the Director of DNQA. He assures uniform application of certification programs by either naming a single DNQA manager to oversee each program as described in item 1 above, or by assigning responsibility for review and acceptance of programs outside of DNQA.

Revision 8, Paragraph 17.0.2.1.3-7 indicates "Developing and implementing a quality control inspection program ... operations."

Revision 9, Paragraph 17.0.5.3-5 indicates "Developing and ... of QA items ... management advised of deficiencies."

1. (17.0-4)
What are QA items and how do these relate to CSSC of Revision 8?

RESPONSE: "QA items" have been changed to "CSSC items". (17.0.5.3, #5

2. ENCLOSURE 2
How does the Site Quality Manager interface with the corporate Quality Systems and Technical Support Groups in the Quality Control Program?

RESPONSE: The Quality Systems Branch develops and documents in the NQAM the programmatic requirements for the quality control/inspection activities and the certification requirements for personnel performing these quality-related activities. The Technical Support Branch ensures that training programs are developed, personnel are trained and qualified to perform the inspection activities, and that sufficient personnel are located at each nuclear facility depending on work load and schedules. The Site Quality Manager implements the inspection program using inspection procedures developed from upper-tier guidance in the NQAM and trained and qualified personnel assigned to him by the Technical Support Branch. As needs change and work loads flucuate, these needs are conveyed to the appropriate DNQA branch and adjustments made as needed.

3. How does the Site Quality Manager interface with Power Stores on receipt inspection material as to deficiencies and inspector qualification?

RESPONSE: Power Stores personnel perform an initial check of all items being received by TVA to determine if quantities are in complicance with the purchase order and that there is no evidence of shipping damage. For QA level 1, 2 and 3 items, personnel from the Site Quality Managers organization perform the detailed receipt inspection to determine item acceptability. Any deficiencies noted during the receiving process are documented by the Site Quality Manager's organization.

CHAPTER 17.1

1. (17.1.2.1, 5th Para.)
Refer to Engineering Procedure "Soil and Rock investigations". It now states, an interfacing quality assurance procedure contained in the NQAM. Are these documents equivalent?

RESPONSE: The described documents are equivalent.

2. (17.1.2.2, 2nd Para.)
The following statement has been added: DNE and DNC are responsible for assuring ... in this topical report. This seems inconsistent with paragraph 17.1.2. Clarify this addition.

RESPONSE: 17.1.2.2 has been revised to be consistent with 17.1.2.

3. (17.1.3.4, 2nd Para.)
This entire paragraph has been added. Justify this addition.

RESPONSE: Description inappropriate and has been deleted.

4. (17.1.5.1, 2nd Para.)
This previously included controls for expendable and consumable materials or equipment. These statements have been deleted. Justify this addition.

RESPONSE: Words on "expendables or consumables" re-inserted.

5. (17.1.5.1)
The last paragraph has been deleted. Justify this deletion.

RESPONSE: The referenced paragraph was a duplication of the description in 17.1.4.

6. (17.1.6, h)
This previously stated nonconformance reports. It has been replaced with conditions adverse to quality. Jusify this change.

RESPONSE: Conditions adverse to quality represents a generic term for various types of nonconformance reports.

7. (17.1.11.4(1) 1st Para.)
Used to state on all systems designed by TVA. This now states on selected systems designed by TVA. Justify this change.

RESPONSE: Description revised to include original words.

8. (17.1.14, 2nd Para.)
Approved procedures replaced by quality assurance program procedures. Justify this change.

RESPONSE: Description changed to read "approved procedures".

9. (17.1.14, 2nd Para., last sentence)
NUC PR replaced by Site Director Interdivisional replaced by interface. Justify this change.

RESPONSE: Changed to reflect organizational changes and current relationship. No change in intent.

10. (17.1.15.2, c)
Accept as is replaced by use as is. Justify this change. Change bar.

RESPONSE: Description changed to "accept-as-is"

11. (17.1.15.4, Title)
Office of Construction replaced by DNE. Justify this change.

RESPONSE: Title changed to "DNC Nonconformances"

12. (17.1.16.2, 3rd Para.)
The item MEDS replaced by RMS. Justify this change.

RESPONSE: "RMS" should read "RIMS" which represents "Records Information Management System" of which MEDS is a part. This term has been replaced by reference to the "corporate records management system" which is more generic.

13. (17.1.17.2)
CQAP and title have been replaced by DNC and DNQA. Justify this change.

RESPONSE: Change reflects current organizational structure and responsibilities.

CHAPTER 17.2

(17.2-2)
1. Revision 8, Paragraph 17.2.2.1 indicates that CSSC covered by the QA program are identified in the FSAR.

Revision 9, Paragraph 17.2.2.1 indicates that CSSC are identified in controlled documents.

1. What are these controlled documents?

RESPONSE: Description in 17.2.2.1 revised.

(17.2-5/17.2-6)
2. Revision 8, the fifth subparagraph under 17.2.3.3 indicates "The Plant Manager approves all site modification activities .... PORC has the final responsibility to verify that: ... have been incorporated." Revision 9, deleted.

RESPONSE: PORC will review all modification packages for safety-related modifications. This package includes the drawings, specifications, ECN, and USQD. When required by Plant Technical Specifications, PORC will also review the resulting work plan. All work plans will receive an independent technical review and a review by the Site Quality Managers organization.

(17.2-10)

6 Revision 8, the sixth subparagraph under 17.2.6 (first on the page) indicates "Field drawings and sketches ... the original issue."

Revision 9, the fifth and sixth subparagraphs under 17.2.6 (page 17.2-9, third and fourth paragraph) which replace the above subparagraph now delineate a difference between field drawings and sketches.

1. Was the difference always clear between the two?
2. Are the field drawings just more detailed as-builts?
3. Are field drawings formally reviewed against existing as-builts?
4. When would a NCR be written against a field drawing anomaly?

RESPONSE:

1. The difference was clear to the extent that neither field drawings or sketches were to conflict with engineering specified requirements, but were intended to clarify or provide supplemental detail to such requirements.
2. Field drawings provide details not specified by the design drawings.
3. If "existing as-builts" are intended to mean engineering drawings, the answer is no because the scope of these documents differ.
4. An NCR would not be written against these documents since they do not establish engineering requirements.

(17.2-13)

7. Revision 8, the last subparagraph reads "Required documentation ... resolves before items are issued for plant use or installtion and declaring components or systems operable."

Revision 9, the second (equivalent) subparagraph on page 17.2-13 and paragraph 17.2.15 do not contain "operability" requirements.

1. Justify/give reasons for change.

RESPONSE: Operability requirement added to 17.2.7.4.

(17.2-14)

8. Revision 8, first sentence of first subparagraph under 17.2.9 contains a definition. Revision 9, deleted.

1. Justify/give reasons for change.

RESPONSE: A provision for definition has been added.

(17.2-15)

9. Revision 8, in the second paragraph under 17.2.10 the Manager of Nuclear Power develops the inspection program and the Plant Manager implements.

Revision 9, in the second subparagraph under 17.2.10 the Manager of Nuclear Power and Plant Manager are deleted while the Site Quality Manager now develops and implements the program.

1. What corporate involvement will there be in the inspection program (see page 47 of the March 10, 1986, Performance Plan).

2. Justify/give reasons for change.

RESPONSE: Discussion revised to state that the inspection program requirements are developed by the DNQA Quality Systems Branch and implemented by the Site Quality Manager.

(17.2-16)

10. Revision 8, the first subparagraph on the page indicates PORC and Plant Manager examine all inspection instructions.

Revision 9, the first subparagraph on page 17.2-15 indicates PORC will review those instructions as specified by the TS.

1. Justify/give reasons for change (potential reduction in commitment).

RESPONSE: See response to question 13.

(17.2-17)

11. Revision 8, the third subparagraph under 17.2.11 indicates that the Plant Manager approves test instructions.

Revision 9, in the fourth subparagraph above 17.2.12 the instructions are stated as being approved by appropriate management.

1. Justify/give reasons for the change.

RESPONSE: See response to question 13.

(17.2-21)

12. Revision 8, the subparagraph at the top of the page indicates "In the event traceability is lost or destroyed ... 17.2.15."

Revision 9, the sentence was deleted.

1. Justify/give reason for the change.

RESPONSE: The sentence has been added.

(7.2-21)

13. Revision 8, the last subparagraph on the page indicates inspections, tests, and operation instructions are reviewed by PORC.

Revision 9, the first subparagraph at the top of page 17.2-20 indicates that PORC will review instructions when required by the TS.

1. Justify/give reason for the change.

RESPONSE: The Topical Report changes concerning "PORC review and plant manager approval" have been made to maintain consistency between the Topical Report and Technical Specifications and to allow the individual sites to pursue alternate methods for fulfilling the responsibilities of PORC. The technical specifications describe the review responsibilities of PORC specifically while the Topical Report provides general descriptions which go beyond the intent of the technical specifications. There are currently proposed technical specification revisions which have been transmitted to NRC for approval and revisions under development centrally by Nuclear Safety and Licensing. These changes put PORC review on a higher level. PORC would review the upper-level administrative procedures while the lower level functional instructions would be reviewed by qualified designated reviewers.

(17.2-24)

14. Revision 8, in the second to last subparagraph it states "... NUC PR establishes requirements for the collection and classification of operation records and for retention and ...."

Revision 9, in the second to last subparagraph on page 17.2-22 indicates "... classification, and storage ...."

1. Who now determines record retention requirements?

RESPONSE: "Retention" added to sentence.

(Table 17B-1 Sheet 3)

15. Revision 8, ID-QAP-3.2 is present.

Revision 9, deleted.

1. Justify/give reason for the change.

RESPONSE: ID-QAPs are interface procedures for specific tasks involving more than one TVA division. The need for this procedure does not exist due to the reorganization.

(Table 17B-1 Sheet 5)

16. Revision 8, ID-QAP-12.1 and ID-QAP-12.2 listed.

Revision 9, ID-QAP-12.1 is listed twice.

1. Is this a typo in Revision 9?

RESPONSE: The second entry of ID-QAP-12.1 is a typo and should read 12.2.

(Table 17B-3 Sheet 1)

17. Revision 8, not present.

Revision 9, under Criteria I and II, for example, OE Organizational Manuals are present.

1. Do the OE Manuals contain instructions found in EN DES-EP 1.01 and 1.30 of (Revision 8) regarding procedure training, minimum personnel requirements, and qualifiction of personnel? If not, where are these requirements for engineerings?

RESPONSE: Yes

2. Why are the manuals termed OE instead of DNE?

RESPONSE: Terms have been updated in Table 17B-3.

3. Do the OE Manuals contain QA elements?

RESPONSE: Yes, these are contained in NEPs which require DNQA concurrence.

4. Do the OE Manuals describe the duties, interactions with DNQA and audit responsibilities of the Manager of Engineering Assurance.

RESPONSE: Reference to the OE Organization Manual has been deleted. These descriptions are now contained in section 17.0.9 of the Topical Report.

(Table 17B-3 Sheets QE10)

18. Revision 8, under Criteria XV and XVI, certain EP (procedures) are listed. EP 1.51 describes trend analysis.

Revision 9, EPs are replaced with OEPs.

1. Where is trend analysis addressed for engineering?

RESPONSE: Trend analysis is addressed in DNE Nuclear Engineering Procedure 9.1.

(Table 17B-5)

19. Revision 8, present. Revision 9, deleted.
1 Justify/give reason for the change.

RESPONSE: Inadvertinly omitted. Has been added.

(Table 17D-1 Sheet 6)

20. Revision 8, remarks for Regulatory Guide (RG) 1.88 states "Conforms fully at Yellow ... N45.2.9)."

Revision 9, the 3-part remark for RG 1.88 indicate as follow: "Conforms fully except as noted ... N45.2.9-1974." "BLN ... facility." "WBN ... N45.2.9-1979."

Justify and give reasons for change.

RESPONSE: The reference to Yellow Creek and other cancelled plants was deleted. The tables for WBN and BLN were combined under Table 17D-1 since both plants are under construction. In the 3-part remark, the first part represents a definition of how quality records are identified and retained. The second part is the R8 commitment for BLN with an added description for the permanent record storage facility. The third part is the previous R8 commitment for WBN.

(Table 17D-2 Sheet 1 Watts Bar)

21. Revision 8, remarks to RG 1.38 read "Conforms fully except... but the classifiction levels of N45.2.2 are not necessarily employed."
Revision 9, remarks to RG 1.38 (17D-1) states "Conforms fully."

1. Justify/give reasons for change.

RESPONSE: The exception was deleted since WBN and BLN, the only plants in construction phase, use the storage level designations as described in N45.2.2.

(Table 17D-3 Sheets 8&9)

22. Revision 8, under ANSI N45.2.12 (Draft 3, Rev. 4-February 1974), TVA took exception to paragraphs 2.3, 3.4.2, 4.3.3 and 5.2.
Revision 9, under ANSI N45.2.12-1977, TVA now takes exception to paragraphs 2.3, 3.5.2, 4.5.2 and 5.2

1. Why is there no change bar for the change in standard revision level?

2. Justify/give reason for the change.

3. The exception to paragraph 4.3.3 is no longer necessary due to the 1977 revision easement in requirement; is the 1977 revision a reduction in commitment?

RESPONSE: Table 17D-2 revised to show no exceptions to ANSI N45.2.12-1977.

(Table 17D-3 Sheet 9)

23. Revision 8, under remarks for RG 1.88, there is some clarification to NFPA-1975 and ANSI N45.2.9-1974 (this revision is endorsed by the RG.)

Revision 9, under remarks for RG 1.88, there is now some clarification to NFPA-1980 and ANSI N45.2.9-1979. The remarks now allow temporary storage of QA records for 60 days.

1. Justify/give reasons for this change (potential reduction; see Tables 17D-1 and 17D-2 for RG 1.88).

RESPONSE: This question is partially addressed in the response to question 9 of enclosure 1. The response to question 9 now shows the commitment to ANSI N45.2.9-1974 with exceptions. In addition to that response it should be noted that TVA is only using that portion of N45.2.9-1979 that has to do with fire protection storage vaults, which require 2-hour rated vault doors and equipment. All other portions of 1974 edition are still used. The temporary storage of records discussion is to help microfilming operations. Consideration is taken for recreatable (multiple copies) and fire-resistive construction of buildings prior to allowing temporary storage.

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