

Mr. Harold R. Denton, Director

March 20, 1986

the recurrence of design/construction deficiencies and noncompliances. I intend to continue the examination of QA activities within the nuclear power program, including those at Watts Bar, and will focus particularly in that programmatic area. Aggressive action to remedy any weaknesses found will be taken. This subject is specifically addressed in Section VI.D of Volume I (Revised) of TVA's Nuclear Performance Plan which was submitted to NRC on March 11, 1986.

Please feel free to contact me or Richard L. Gridley of my staff if you have any questions or need for further information concerning this response.

Very truly yours,

S. A. White

S. A. White
Manager of Nuclear Power

Sworn to and subscribed to before me
this 20th day of March 1986

Susan C. Parker
Notary Public

My Commission Expires 2/7/90

RLG:JAD:KES

Enclosure

cc (Enclosure):

Mr. James Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region II
Attention: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

RIMS, MR 4N 72A-C
W. R. Brown, 9-169 SB-K
W. T. Cottle, LP 6N 37A-C
W. C. Drotleff, W12 A12 C-K
R. L. Gridley, LP 5N 157B-C
R. B. Kelly, LP 4N 45A-C (2)
C. C. Mason, LP 6N 37A-C

B. R. McCullough, 12-108 SB-K
Herbert S. Sanger, Jr., E11 B33 C-K
M. B. Shymlock, Watts Bar-NRC
Site Director, ONP, Watts Bar
G. Wadewitz, Watts Bar
K. W. Whitt, E3 A8 C-K

6N 38A Lookout Place

R5

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In the Matter of the Application of Tennessee Valley Authority) Docket Nos. 50-390
) 50-391

Pursuant to the commitment made in Chairman Dean's January 9, 1986 letter, I am responding to your January 3, 1986 letter by providing the Tennessee Valley Authority's (TVA) corporate position with respect to whether or not, in light of the conclusion stated in the, "NSRS Perceptions of Watts Bar Status," (NSRS Perceptions), the 10 CFR Part 50, Appendix B requirements are being met at the Watts Bar facility. As requested in your January 3, 1986 letter, information is provided on an item-by-item basis in the enclosure to this letter that supports the TVA position and addresses: (1) each issue identified in the NSRS Perceptions; (2) the programs/procedures in place to address each such issue; and (3) the corrective actions(s) planned or taken in response to each such issue.

On the basis of a review of the issues identified in the NSRS Perceptions, as reflected in the enclosure, I find that there has been no pervasive breakdown of the quality assurance (QA) program, that problems have been identified, and that TVA has remedied or will remedy all identified construction deficiencies and noncompliances, and that accordingly, the overall QA program is in compliance with 10 CFR Part 50, Appendix B. At the same time, it should be noted that my mission as the Manager of the Office of Nuclear Power is to enhance the management and management controls of all TVA nuclear power program activities, including those for QA.

Although the enclosure shows that a broad range of corrective actions is already in place at Watts Bar, I and my newly appointed QA Manager, Richard B. Kelly, will be undertaking further examination of QA program effectiveness in the nuclear power program in general and at Watts Bar in particular. If that further examination reveals construction deficiencies, noncompliances, and/or programmatic weaknesses, rest assured that timely corrective action will be taken, including work stoppage if that is appropriate. While positive findings have been made concerning the issues identified in the NSRS Perceptions and the adequacy of the overall QA program, I recognize that the major thrust of those Perceptions is directed toward the ineffectiveness of corrective actions, and management implementation of those actions, to prevent the recurrence of

Mr. Harold R. Denton, Director

construction deficiencies and noncompliances. I intend to continue the examination of QA activities within the nuclear power program, including those at Watts Bar, and will focus particularly in that programmatic area. Aggressive action to remedy any weaknesses found will be taken.

Please feel free to contact me or Richard L. Gridley of my staff if you have any questions or need for further information concerning this response.

Very truly yours,

S. A. White
Manager of Nuclear Power

Sworn to and subscribed to before me
this _____ day of _____ 1986

Notary Public

My Commission Expires _____

Enclosure

cc (Enclosure):

Mr. James Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region II
Attention: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Bob Mullin

R4

2/19

mcg/xc: rln /
teh

DATE

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In the Matter of the Application of)
Tennessee Valley Authority) Docket Nos. 50-390
50-391

Pursuant to the commitment made in Chairman Dean's January 9, 1986 letter, I am responding to your January 3, 1986 letter by providing the Tennessee Valley Authority's (TVA) corporate position with respect to whether or not, in light of the conclusion stated in the "NSRS Perceptions of Watts Bar Status" (NSRS Perceptions), the 10 CFR Part 50, Appendix B requirements are being met at the Watts Bar facility. As requested in your January 3, 1986 letter, information is provided on an item-by-item basis in the enclosure to this letter that supports the TVA position and addresses: 1) each issue identified in the NSRS Perceptions; 2) the programs/procedures in place to address each such issue; and 3) the corrective actions(s) planned or taken in response to each such issue.

On the basis of our review of the issues identified in the NSRS Perceptions, as reflected in the enclosure, we find that there has been no pervasive breakdown of the Quality Assurance (QA) program, that the program has identified and TVA has remedied or will remedy all identified construction deficiencies and noncompliances, and that accordingly, the overall QA program is in compliance with 10 CFR Part 50, Appendix B. At the same time, we should emphasize that my own mission as the Manager of the Office of Nuclear Power is to enhance the management and management controls of all TVA nuclear power program activities, including those for QA. Although the enclosure shows that a broad range of corrective actions are already in place at Watts Bar, I and my newly appointed QA Manager, Richard B. Kelly, will be undertaking further examination of QA program effectiveness in the nuclear power program in general and at Watts Bar in particular. If that further examination reveals construction deficiencies, noncompliances, and/or programmatic weaknesses, rest assured that timely corrective action will be taken, including work stoppage if that is appropriate. While we have made positive findings concerning the issues identified in the NSRS Perceptions and the adequacy of the overall QA program, we recognize that the major thrust of those Perceptions is directed toward the ineffectiveness of corrective actions, and management implementation of those actions, to prevent the recurrence of

Mr. Harold R. Denton, Director

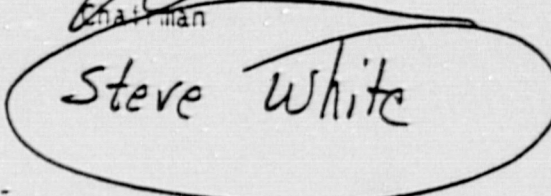
DATE

construction deficiencies and noncompliances. Our further examination of QA activities within the nuclear power program, including those at Watts Bar, will focus particularly in that programmatic area, and we will take aggressive action to remedy any weaknesses found.

Please feel free to contact me or Mr. _____ of my staff if you have any questions or need for further information concerning this response.

Very truly yours,


C. H. Dean
Chairman


Steve White

Enclosure

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

6N 38A Lookout Place

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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In the Matter of the Application)
of the Tennessee Valley Authority)

Docket Nos. 50-390
50-391

As previously committed in Chairman Dean's January 9 response to your January 7, 1986 letter, I have reviewed the issue of compliance with 10 CFR Part 50, Appendix B, at the Watts Bar Nuclear Plant. To the best of my knowledge and belief the plant is being constructed in conformity with Appendix B. Consequently, TVA's corporate position is that 10 CFR Part 50, Appendix B requirements are being met at the Watts Bar facility.

Some members of TVA's Nuclear Safety Review Staff (NSRS) who concluded and informed Commissioner Asselstine at the December 19, 1985 briefing that TVA did not meet Appendix B requirements are still of this opinion. Because of this, TVA's corporate position was determined only after TVA management and an outside consultant team thoroughly reviewed the issues raised by NSRS.

TVA has established and implemented a Quality Assurance Program as required by 10 CFR Part 50, Appendix B. This program is documented in the TVA Topical Report, TVA-TR75-1, and implemented by written policies, procedures, and instructions. The Quality Assurance Program includes measures for the identification, documentation, and correction of deficiencies, so that there is reasonable assurance that as built the facility can and will be operated without endangering public health and safety. In short, perfection in plant construction and the facility construction quality assurance program is not a precondition for a license under either the Atomic Energy Act or the Commission's regulations. This was stated in the Atomic Safety and Licensing Appeal Board ruling in December 1983 regarding the quality assurance program at Pacific Gas and Electric Company's Diablo Canyon Nuclear Plant (ALAB-756, 18 NRC 1340 (1983)).

In addition to Quality Assurance Program measures for identifying and controlling deficiencies, TVA's NSRS and its Employee Concern Program have aggressively solicited the identification of deficiencies. Concerns identified through NSRS and the Employee Concern Program are being evaluated for potential safety significance. Where substantiated, concerns will be reviewed to determine what corrective action is necessary. TVA's line organization will resolve such concerns (including work stoppage if appropriate), and will report deficiencies as required under NRC regulations, taking action to prevent recurrence, and investigating generic implications.

Mr. Harold R. Denton

Roughly half of the deficiencies identified by NSRS and the concern program at Watts Bar have corrective action identified. TVA will complete the evaluation of the remaining issues to identify any necessary corrective action on a timely basis. It is clear that some further deficiencies may yet be identified. Where appropriate, TVA will halt work until quality compliance can be assured. TVA will take measures to identify and correct every deficiency as required by 10 CFR Part 50, Appendix B.

Your staff may review any activity underway to accomplish these tasks. In addition, the specific information you requested on an item-by-item basis for your list of issues is provided in the enclosure.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

S. A. White
Manager of Nuclear Power

Sworn to and subscribed before me
this _____ day of _____ 1986.

Notary Public

My Commission Expires _____

cc: Mr. James Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region II
Attention: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

All activities underway to accomplish these tasks are available for review by your staff. Any additional information required from Mr. White and his staff is available on request.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

C. H. Dean, Jr.
Chairman

Sworn to and subscribed before me
this _____ day of _____ 1986.

Notary Public

My Commission Expires _____

Handwritten initials

DRAFT: JAD:KES 1/14/86 ✓
REDRAFT: DRW:LEW:ECS 1/17/86

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NOTE: If it is determined that TVA is in compliance with Appendix B, this letter is legally satisfactory.

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In the Matter of the Application) Docket Nos. 50-390
of the Tennessee Valley Authority) 50-391

As we promised in our January 9 response to your January 3, 1986 letter, Steven A. White, TVA's Manager of Nuclear Power, has reviewed the issue of compliance at the Watts Bar facility with 10 CFR Part 50, Appendix B. Based on his review, the following represents TVA's corporate position on the question asked in your letter.

TVA has established and implemented a Quality Assurance Program for 10 CFR Part 50, Appendix B. As required, this program is documented in the FSAR and by written policies, procedures, and instructions and is implemented in accordance with these documents. The Quality Assurance Program includes measures for the identification, documentation, and correction of deficiencies. In addition to these Quality Assurance Program measures for identifying and controlling deficiencies, TVA's Nuclear Safety Review Staff (NSRS) and the Employee Concern Program aggressively solicit the identification of deficiencies.

Concerns identified through NSRS and the Employee Concern Program are evaluated for potential safety significance. Substantiated concerns are

reviewed to determine what corrective action is necessary. TVA's line organization resolves such concerns (including work stoppage if appropriate), reports deficiencies as required under NRC regulations, takes action to prevent recurrence, and investigates generic implications.

Not all the deficiencies identified by NSRS and the concern program at Watts Bar have as yet been corrected, and many are still being evaluated to determine necessary corrective action. It is clear that some further deficiencies may yet be identified; and, where appropriate, TVA has halted work until it can assure quality compliance. TVA will take measures to identify and correct every deficiency as required by 10 CFR Part 50, Appendix B. Under these circumstances, to the best of our knowledge and belief, 10 CFR Part 50, Appendix B requirements are being met at the Watts Bar facility.

Mr. White or his staff will provide the additional information you requested in your January 3 letter no later than February 3, 1986.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

C. H. Dean, Jr.
Chairman

Sworn to and subscribed before me
this _____ day of _____ 1986.

Notary Public

My Commission Expires _____

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