



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

July 24, 1995

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

Gentlemen:

In the Matter of the)	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 ORGANIZATION TOPICAL REPORT - BELLEFONTE, BROWNS FERRY, SEQUOYAH, AND WATTS BAR NUCLEAR PLANTS - RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

This is in response to NRC's letter dated July 20, 1995, which requested additional information on TVA's revised Nuclear Organization Topical Report that was submitted on June 29, 1995. The enclosure to this letter provides the requested information.

There are no new commitments contained in this letter. If you have any questions concerning this information, please telephone Vic Whaley at (615) 751-7009.

Sincerely,

Patrick P. Carier
Manager
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Enclosure
cc: See page 2

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Enclosure

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ENCLOSURE

The following provides TVA's response to each NRC request/question:

1. NRC Question: Page 3-1 and Figure 3-2 have different titles for a specific function. Is the correct title "General Manager, Operations Services" or "General Manager, Operations Support"?

TVA Response: The correct title for this position is: "General Manager, Operations Support."
2. NRC Request: For the corporate and individual site Nuclear Assurance and Licensing organizations, the specific responsibilities have been deleted and referenced to the TVA Nuclear Assurance Plan (TVA-NQA-PLN89-A). Provide evidence that the specific responsibilities are incorporated into the referenced document.

TVA Response: Attached are the pages of Section 4, "Organization," of TVA's Nuclear Assurance Plan, which provide specific responsibilities for the Nuclear Assurance and Licensing organization.
3. NRC Question: In Section 3.4, describing the Sequoyah site organization, the position of Assistant Plant Manager is shown on the organization chart. However, the position is not mentioned as directly reporting to the plant manager in the description, nor are responsibilities defined. Has the position of Assistant Plant Manager been added to the Sequoyah organization? If so, provide the reporting relationship to the Plant Manager and provide a list of responsibilities.

TVA Response: The Assistant Plant Manager position at SQN, WBN, and BFN was established in the past year as a developmental position that reports to the Plant Manager. This position is not required for safe operation of the plant. The following provides the responsibilities' accountabilities for this position:

 1. Manages multiple departments in the plant organization which develops the incumbent for progression to a Plant Manager position.
 2. Assumes full responsibility and accountability of the Plant Manager in his/her absence, or as assigned.

The inconsistencies identified in TVA's Nuclear Organization Topical Report, as discussed above, will be corrected in the next update.

ATTACHMENT**4.1.3.B (continued)****3. Manager, Nuclear Security**

The Manager, Nuclear Security, reports directly to the Vice President, E&TS, and is responsible for nuclear security-related activities. The Manager, Nuclear Security, is responsible for ensuring that the QA requirements established by this plan in the following activity areas related to nuclear security are either included or referenced (as appropriate) in related E&TS-sponsored upper-tier Corporate program documents.

- a. Protection of safeguard information
- b. Reporting of safeguard events
- c. Development and maintenance of the Site Physical Security/Contingency Plans

4. General Manager, Nuclear Assurance and Licensing (NA&L)

The General Manager, NA&L reports directly to the Vice President, E&TS, and has an independent reporting relationship to the President, TVA Nuclear and Chief Nuclear Officer, on quality matters. This is to ensure that the quality organization has direct access to appropriate levels of management and sufficient independence and organizational freedom to be able to effectively assure conformance to quality assurance program requirements. The General Manager, NA&L, manages Independent Review and Analysis; Quality Assurance; Licensing and Generation Planning and the Site NA&L Managers. The responsibilities of the General Manager, NA&L, and his direct reports are noted in Section 4.1.3.C.

5. Chairman, Nuclear Safety Review Board

The Chairman, Nuclear Safety Review Board (NSRB) reports to the Vice President, E&TS, and has an independent reporting relationship to the President, TVA Nuclear and Chief Nuclear Officer and other TVAN management on nuclear safety matters. The Chairman, NSRB, is responsible for advising the President, TVA Nuclear and Chief Nuclear Officer on the adequacy and implementation of TVA's nuclear safety policies and programs and for evaluating these policies and programs for compliance with regulatory requirements governing nuclear safety. The Chairman, NSRB, is responsible for complying with the requirements of ANSI N18.7-1976/ANS 3.2. The Chairman, NSRB, is also responsible for ensuring that the QA requirements established by this plan related to NSRB functions are either included or referenced (as appropriate) in related procedures or instructions.

4.1.3.B (continued)

6. Manager, Emergency Preparedness

The Manager, Emergency Preparedness, reports to the Vice President, ETS, and is responsible for ensuring that the QA requirements established by this plan in emergency preparedness activity areas are either included or referenced (as appropriate) in related E&TS-sponsored upper-tier Corporate program documents.

7. General Manager, Information Services Projects

The General Manager, Information Services Projects, reports to the Vice President, E&TS, and is responsible for ensuring that the QA requirements established by this plan in the following activity areas are either included or referenced (as appropriate) in related E&TS sponsored upper-tier corporate program documents.

- a. Procedures and instructions
- b. Document control
- c. Quality assurance records
- d. Computer software and data

C. General Manager, Nuclear Assurance and Licensing (NA&L)

The General Manager, NA&L, is responsible for:

1. Developing and administering the Nuclear Quality Assurance Plan and the NA&L organization procedures required to ensure that TVA activities provide the required degree of safety and reliability.
2. Auditing, inspecting, and assessing the conduct of TVA activities at Corporate and nuclear plant sites to ensure that they provide the required high degree of safety and reliability and are carried out consistent with applicable laws, regulations, regulatory commitments, licenses, and other requirements.
3. Directing and managing the NA&L organization.
4. Stopping work or further processing, delivery, or installation or taking other comparable actions when warranted to control and/or prevent the use of nonconforming materials or continuance of activities adverse to quality at Corporate and nuclear plant sites.
5. Establishing upper-tier QA requirements for QA training and for assessing the implementation and effectiveness of that training.
6. Maintaining an interface between TVA and NRC for quality-related activities.

4.1.3.C (continued)

7. The General Manager, NA&L, administers quality assurance and licensing responsibilities through the following managers:

Quality Assurance Manager (corporate)
Site NA&L Manager
Independent Review and Analysis Manager (corporate)
Licensing and Generation Planning Manager (corporate)

The General Manager, NA&L, is required to have a bachelor's degree in an engineering or related science, or equivalent related experience. The General Manager, NA&L, shall have at least 10 years experience in an executive managerial capacity with five years' experience in nuclear quality assurance and/or licensing.

The NA&L organization is shown in Appendix H.

- a. Quality Assurance Manager (corporate)

The Quality Assurance Manager is responsible to:

1. Develop and implement the vendor audit and services QA program which includes auditing, source inspection, and surveillance of supplier activities. Develop and maintain the Acceptable Suppliers List (ASL) of approved vendors.
2. Develop, review, and maintain the Nuclear Quality Assurance Plan.
3. Provide quality assurance support for TVAN organizations.
4. Review and/or audit QA programs of TVA and supplier organizations supporting the nuclear program.
5. Establish upper-tier QA requirements for auditing and assessing activities.
6. Assess NDE, quality engineering, quality control, and QA activities.
7. Review and/or assess Corporate procurement documents for QA requirements, utilizing graded approach criteria.

4.1.3.C.7.a (continued)

8. Conduct overview of procured engineering services (offsite) including the review of procurement documents for QA requirements utilizing graded approach criteria, in-depth technical and/or performance based auditing, performing preaward surveys, and reviewing contractor QA programs.
9. Audit or assess TVA quality-related programs (Corporate and site).
10. Review and/or assess Corporate standards identified as quality related, utilizing graded approach criteria, to assess their adequacy.
11. Plan, conduct, and report the results of Corporate and site audits and follow-up identified adverse conditions to ensure appropriate corrective action has been taken.
12. Conduct in-depth technical audits and assessments to assess the technical adequacy of TVA engineering activities.
13. Perform audits and assessments of engineering, construction and operations activities to determine compliance with QA program requirements.
14. Review and/or audit QA programs of TVA organizations which support quality-related activities.

b. Site NA&L Manager

The Site NA&L Manager establishes and maintains a site quality organization to perform the quality control and quality assessing functions. In addition, the Site NA&L Manager is responsible to provide a Licensing organization and an Independent Review and Analysis organization (except BLN). The Site NA&L Manager is involved in day-to-day plant quality-related activities through participation in plant meetings, review of relevant documentation, and execution of the following duties and responsibilities:

1. Assisting Site management in developing, planning, initiating, directing, and assessing nuclear plant QA programs.
2. Reviewing and/or assessing work control documents and activities.

4.1.3.C.7.b (continued)

3. Evaluating the effectiveness of the nuclear quality assurance program through assessing, inspection, and review.
4. Verifying through assessing or other means that quality assurance requirements are contained in applicable Site QA program procedures.
5. Developing and implementing the Site quality control inspection program.
6. Working with Site management to support quality improvement by performing functions such as trend analysis, root cause analysis of quality deficiencies, evaluation of dispositions of major quality issues, interface with line management on quality improvement initiatives, and development of QA operational/start-up readiness assessment plans.
7. Stopping work or further processing, delivery or installation, and issuing formal stop work orders when warranted to control and/or prevent the use of nonconforming materials or continuance of activities adverse to quality.
8. Performing in-depth technical assessments to determine the effectiveness of engineering work (onsite).
9. Reviewing and/or assessing procurement documents and activities, including services (onsite), utilizing graded approach criteria to assess their adequacy.
10. Providing periodic assessments on the adequacy and effectiveness of QA program implementation by involved Site TVA organizations and support by Corporate organizations.
11. Implementing inspection activities associated with the ASME Section III Program at applicable Sites and assisting the responsible organization at the Sites in the performance of ASME Section XI NDE.
12. Planning, conducting, and reporting the results of Site assessments, and following up identified adverse conditions to ensure appropriate corrective action has been taken.

4.1.3.C.7.b (continued)

13. Ensuring assessments of Site engineering, construction, and operations activities are performed to determine compliance with QA program requirements.
14. Performing assessments of onsite contractors, including onsite major engineering contractors who perform engineering services.
15. Establishing and maintaining a Site Licensing Program and performing Independent Review and Analysis activities.
16. Reviewing the ASME III QAM (WBN and BLN).

The Site NA&L Managers are required to have a bachelor's degree in an engineering or scientific discipline, or equivalent related experience. They shall have at least nine years experience in plant design, construction, power plant operation or maintenance, including five years experience in QA-related activities. They are required to have at least one year of experience in the QA organization of a nuclear power plant at the time of initial core loading or assignment to the active position.

The NA&L organizations are shown in Appendix H.

c. Independent Review and Analysis Manager (corporate)

The Independent Review and Analysis Manager is responsible to:

1. Manage the Independent Safety Engineering function (as required by NUREG 0737) and the Nuclear Experience Review Program.
2. Manage a program for tracking and trending adverse conditions.
3. Provide Nuclear Safety Review Board support.

d. Licensing and Generation Planning Manager (corporate)

The Licensing and Generation Planning Manager is responsible for maintaining an interface between TVA and NRC for licensing activities.