



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

December 2, 1993

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

In the Matter of	)	Docket Nos.	50-259	50-327
Tennessee Valley Authority	)		50-260	50-328
			50-296	50-438
			50-390	50-439
			50-391	

**TVA NUCLEAR QUALITY ASSURANCE (NQA) PLAN (TVA-NQA-PLN89-A) - REVISION 3 CHANGES**

Changes to the subject NQA Plan, provided as the enclosure, are submitted in accordance with the requirements of 10 CFR 50.54(a)(3) and 10 CFR 50.55(f)(3). This proposed change revises TVA's commitment to Regulatory Guide 1.58, by providing an alternative approach for the qualification of containment leak rate testing personnel. The alternative approach is as follows:

Containment leak rate personnel as a minimum will meet the qualification requirement of ANSI N45.2.6.

The proposed change is a reduction in TVA's previous commitment which was made in 1978 to certify containment leak rate testing personnel in accordance with ASNT SNT-TC-1A. However, this reduction of commitment is consistent with general industry practices. In addition, the alternative approach satisfies NRC's requirements for performing leak testing functions.

The proposed change will be implemented upon NRC's approval or 60 days after the date of this letter, whichever occurs first. These changes will be submitted in the next annual update to the NQA Plan. If you have any questions or if we can be of any assistance, please telephone P. J. Hammons at (615) 751-2736.

Sincerely,

*Bruce S. Schofield*  
for **Bruce S. Schofield**  
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Enclosure  
cc: See page 2

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ENCLOSURE

<u>Section Number</u> <u>Revision 3</u>	<u>Proposed Change</u>	<u>Justification</u>
9.3.4.L (page 56)	American Society for Nondestructive Testing (ASNT) Recommended Practice, SNT-TC-1A-1984, except for containment leak rate testing personnnel.	TVA will continue to meet the requirements of Section 9.3 for containment leak rate testing with the exception of the qualifi- cation requirements for containment leak rate testing personnel.
Appendix B (page 100)	Alternative to Regulatory Guide 1.58  6. TVA complies with Regulatory Position C. 2, as follows: For containment leak rate testing personnel, TVA as a minimum will meet the qualification requirements of ANSI N45.2.6.	TVA recently conducted a survey of several utilities to determine implementation of SNT-TC-1A for containment leak rate testing personnel. Results of the survey revealed that it was not an industry practice to impose SNT-TC-1A qualification requirements for this activity.  The alternative will align TVA's practice with prevailing industry practices.