



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 3, 1994

Docket Nos. 50-259, 50-260, 50-296
50-327, 50-328, 50-390,
50-391, 50-438 and 50-439

Mr. Oliver D. Kingsley, Jr.
President, TVA Nuclear and
Chief Nuclear Officer
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: FOURTH AND FIFTH ANNUAL REPORTS OF EMPLOYEE CONCERNS SPECIAL PROGRAM CORRECTIVE ACTION IMPLEMENTATION - BROWNS FERRY, SEQUOYAH, WATTS BAR AND BELLEFONTE NUCLEAR PLANTS (TAC NOS. M86662, M86663, M86664, M86665, M86666, M86667, M86668, M86669, AND M86670)

Reference: Frederick J. Heddon's letter to Dr. Mark O. Medford September 23, 1993, Subject: Third Annual Report of Employee Concerns Special Program Corrective Actions Implementation - Sequoyah, Browns Ferry, Watts Bar and Bellefonte Nuclear Plants (TAC Nos. M82063, M82064, M82065, M82066, M82067, M82069, M82070 and M82071)

By letters dated February 9, 1993 and May 19, 1993, the Tennessee Valley Authority (TVA) submitted the Fourth and Fifth Annual Reports of Employee Concerns Special Program Corrective Actions Implementation, respectively. These reports are for the periods January 1, 1991 - December 31, 1991, and January 1, 1992 - December 31, 1992, respectively. The purpose of these reports was to update the NRC on the closure status of Corrective Action Tracking Documents (CATDs) which were developed as part of the Employee Concerns Special Program (ECSP) and to summarize any deviations made from original corrective action plans (CAPs) for the CATDs. The staff points out that whereas the justification for Level II CAP deviations can be acceptable as articulated in the annual reports, subsequent field inspections can prompt questions concerning the adequacy of corrective action plans or how they were implemented. Inspectors have in the past found some problems with the CATD corrective action plans. This can include both original plans which have no changes and those with acceptable deviations.

Concerning the Fourth Annual ECSP Report dated February 9, 1993

The Fourth Annual ECSP Report identified 40 Level II CAP deviations and 60 Level III CAP deviations for the Browns Ferry Nuclear Plant (BFN), the Sequoyah Nuclear Plant (SQN), the Watts Bar Nuclear Plant (WBN), and the Bellefonte Nuclear Plant (BLN) programs. There were no Level I deviations identified (i.e., deviations which require NRC approval prior to

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implementation). TVA is required to provide the NRC with written technical justification for any Level II CAP deviations but is not required to justify Level III deviations.

The staff has reviewed TVA's Fourth Annual ECSP Report and concludes that the technical justifications provided for the Level II CAP deviations are acceptable.

TVA's Fourth Annual ECSP Report provided a revised technical justification for a Level II CAP deviation to CATD 31307-BFN-01. This revised technical justification was requested by the NRC staff in the reference. The staff has reviewed the resubmitted justification for the Level II deviation to CATD 31307-BFN-01 and finds the deletion of the reference to NUREG-0313, Revision 2 acceptable since the remaining reference to Regulatory Guide 1.36 covers the requirements adequately.

Concerning the Fifth Annual ECSP Report dated May 19, 1993

The Fifth Annual ECSP Report identified 37 Level II CAP deviations and 30 Level III CAP deviations. There are no Level I deviations identified. The staff has reviewed TVA's Fifth Annual ECSP Report and concludes that the technical justifications provided for Level II CAP deviations are acceptable.

This action closes the TAC Numbers listed above.

Sincerely,

Original signed by

Frederick J. Hebdon, Director
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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DATE	5/3/94	5/3/94	5/3/94	5/3/94	5/3/94

OFC	PDII-4/PH	RII	PDII-4/D	RII	
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