

SITE DIRECTOR (ACTING), BROWNS FERRY NUCLEAR PLANT
THOMAS F. ZIEGLER

WORK EXPERIENCE

OCT 85 - PRESENT	SITE DIRECTOR (ACTING), BROWNS FERRY NUCLEAR PLANT, TVA
MAR 85 - OCT 85	ACTING ASSISTANT TO SITE DIRECTOR AND SITE SERVICES MANAGER, BROWNS FERRY NUCLEAR PLANT, TVA
MAY 84 - MAR 85	MANAGER, SITE SERVICES, BROWNS FERRY NUCLEAR PLANT, TVA
MAR 84 - MAY 84	ASSISTANT TO PLANT MANAGER, BROWNS FERRY NUCLEAR PLANT, TVA
SEP 81 - MAR 84	CHIEF, MECHANICAL BRANCH, DIVISION OF NUCLEAR POWER, TVA, CHATTANOOGA
FEB 81 - SEP 81	CHIEF, MAINTENANCE BRANCH, DIVISION OF NUCLEAR POWER, TVA, CHATTANOOGA
JUN 80 - FEB 81	MAINTENANCE AND ENGINEERING COORDINATOR, DIVISION OF NUCLEAR POWER, TVA, CHATTANOOGA
NOV 79 - JUN 80	CHIEF, NUCLEAR MAINTENANCE BRANCH, TVA, CHATTANOOGA
APR 77 - NOV 79	SUPERVISOR, REACTOR AND AUXILIARY SECTION, POWER PLANT MAINTENANCE BRANCH, DIVISION OF POWER PRODUCTION, TVA, CHATTANOOGA
OCT 76 - APR 77	SUPERVISOR, PLANNING AND SCHEDULING SECTION, DIVISION OF NUCLEAR POWER, TVA, CHATTANOOGA
JAN 70 - OCT 76	MECHANICAL ENGINEER, DIVISION OF POWER PRODUCTION, PROGRESSIVE ADVANCEMENT THROUGH THE STEAM-ELECTRIC GENERATION BRANCH AND POWER PLANT MAINTENANCE BRANCH, TVA, ALLEN STEAM PLANT AND CHATTANOOGA

MANAGEMENT TRAINING

JUL 83 - CURRENT ECONOMIC CONDITIONS -- HOW WE GOT HERE, WHERE WE ARE GOING

- JUL 83 - MANAGING IN AN ENVIRONMENT OF NEGATIVE ATTITUDES
- MAR 83 - MANAGING MANAGEMENT TIME
- FEB 83 - WHAT YOU ARE IS. . . MANAGEMENT DEVELOPMENT FILM
- JAN 72 - SUPERVISOR DEVELOPMENT PROGRAM

TECHNICAL TRAINING

- OCT 83 - INSTITUTE OF NUCLEAR POWER OPERATIONS
- OCT 83 - MAINTENANCE PLANNING AND SCHEDULING
- FEB 80 - H. P. ROTORS, WESTINGHOUSE, PHILADELPHIA
- NOV 74 - LIQUID PENETRANT TESTING
- JUL 73 - RADIOLOGICAL HYGIENE TRAINING
- NOV 83 - RADIOLOGICAL EMERGENCY PLANNING
- OCT 76 - ENGINEER TRAINING PROGRAM, TVA'S OFFICE OF POWER

SEMINARS AND CONFERENCES

- FEB 85 - BWR OPERATING PLANT TECHNICAL CONFERENCE MANAGEMENT COMMITTEE MEMBER
- JAN 84 - STEAM GENERATORS OWNERS GROUP,
- AUG 83 - NRC MEETING, WASHINGTON, D.C.
- JAN 83 - NRC MEETING, WASHINGTON, D.C.
- NOV 82 - BROWNS FERRY NUCLEAR PLANT TURBINE MEETING, GENERAL ELECTRIC
- JUL 82 - E.P.R.I. MEETING
- JAN 81 - POOLED INVENTORY MANAGEMENT, COMMITTEE MEMBER, STEERING COMMITTEE MEMBER
- FEB 80 - BWR OPERATING PLANT TECHNICAL CONFERENCE

EDUCATION

- 1970 B.S. ENGINEERING PHYSICS, UNIVERSITY OF TENNESSEE AT CHATTANOOGA

PUBLICATIONS, AWARDS, AND/OR PAPERS PRESENTED (WORK RELATED)

- 1980 ASME TECHNICAL CONFERENCE, MAINTENANCE TRAINING, CHARLOTTE, NORTH CAROLINA

LICENSES/CERTIFICATES

CAREER HIGHLIGHTS

- o SITE SERVICES MANAGER RESPONSIBLE FOR EXECUTIVE AND ADMINISTRATIVE SUPERVISION OF TECHNICAL, INDUSTRIAL MANAGEMENT, AND ADMINISTRATIVE SERVICES AT BROWNS FERRY NUCLEAR PLANT.
- o MECHANICAL BRANCH CHIEF RESPONSIBLE FOR CORPORATE SUPPORT FOR PLANT CHEMISTRY, METALLURGY, AND WELDING.
- o AS CHIEF, NUCLEAR MAINTENANCE BRANCH, WAS RESPONSIBLE FOR REACTOR, ELECTRICAL, AND ROTATING EQUIPMENT MAINTENANCE GROUPS.
- o MECHANICAL SYSTEM TESTING, MECHANICAL EQUIPMENT AND CIVIL FEATURES.
- o POWER PLANT MAINTENANCE ENGINEER (NUCLEAR AND METALLURGICAL) FOR FOSSIL, HYDRO, AND NUCLEAR PLANTS.
- o INTERDIVISIONAL PROCEDURE COMMITTEE PROCUREMENT TASK FORCE MEMBER.
- o FUNCTIONED AS ASSISTANT OUTAGE DIRECTOR DURING THE BROWNS FERRY NUCLEAR PLANT FIRE RESTORATION OUTAGE.

SITE DIRECTOR, SEQUOYAH NUCLEAR PLANT
HERBERT L. ABERCROMBIE

WORK EXPERIENCE

NOV 84 - PRESENT SITE DIRECTOR, TVA, SEQUOYAH NUCLEAR PLANT

APR 84 - NOV 84 DIRECTOR, DIVISION OF NUCLEAR SERVICES, TVA, CHATTANOOGA

SEP 81 - APR 84 ASSISTANT MANAGER, NUCLEAR PRODUCTION, TVA, CHATTANOOGA

JUL 79 - SEP 81 POWER PLANT SUPERINTENDENT, TVA, BROWNS FERRY NUCLEAR PLANT

MAR 77 - JUL 79 ASSISTANT POWER PLANT SUPERVISOR, TVA, BROWNS FERRY NUCLEAR PLANT

JAN 70 - MAR 77 POWER PLANT OPERATIONS SUPERINTENDENT, TVA, SEQUOYAH NUCLEAR PLANT

MAY 68 - JAN 70 POWER PLANT OPERATIONS SUPERVISOR, POWER PRODUCTION, TVA, CHATTANOOGA

JUL 66 - MAY 68 PERSONNEL OFFICER, POWER PRODUCTION, TVA, CHATTANOOGA

NOV 63 - JUL 66 SHIFT ENGINEER, DIVISION OF POWER PRODUCTION, TVA

DEC 53 - NOV 63 UNIT OPERATOR, DIVISION OF POWER PRODUCTION, TVA. PROGRESSIVE ASSIGNMENTS AFTER COMPLETION OF TVA'S STUDENT GENERATING PLANT OPERATOR (SGPO) TRAINING PROGRAM

DEC 50 - DEC 53 U.S. NAVY

MANAGEMENT TRAINING

JUL 83 - MANAGING IN AN ENVIRONMENT OF NEGATIVE ATTITUDES, AUBURN UNIVERSITY

JUL 83 - CURRENT ECONOMIC CONDITIONS--HOW WE GOT HERE, WHERE WE ARE GOING, AUBURN UNIVERSITY

MAR 83 - MANAGING MANAGEMENT TIME, THE BURROWS CO., INC.

FEB 83 - WHAT YOU ARE IS. . . . MANAGEMENT DEVELOPMENT FILM

MAY 76 - MANAGEMENT/SUPERVISORY TRAINING

JUN 70 - BASIC SUPERVISORY TRAINING

APR 62 - JOB RELATIONS TRAINING

TECHNICAL TRAINING

MAY 76 - ONSITE LECTURES AT SQN OPERATOR TRAINING, WESTINGHOUSE ELECTRIC CORP.

MAR 76 - APPLICATIONS AND LIMITATIONS OF NONDESTRUCTIVE TESTING

JAN 76 - TVA SYSTEMS (SITE TRAINING, SEQUOYAH NUCLEAR PLANT

SEP 75 - (TO OBSERVE HOT FUNCTIONAL TESTING) TROJAN NUCLEAR PLANT, PORTLAND, OREGON

MAY 75 - AMERICAN NUCLEAR SOCIETY 2ND SYMPOSIUM ON NUCLEAR TRAINING

JUL 72 - SEQUOYAH FAMILIARIZATION SYSTEMS

APR 71 - OBSERVATION TRAINING AT GINNA NUCLEAR PLANT

DEC 70 - REACTOR OPERATOR TRAINING PROGRAM 26 STARTUPS, WESTINGHOUSE ELECTRIC CORP.

DEC 70 - WESTINGHOUSE COLD LICENSE COURSE (CERTIFIED TRAINING COURSE), COMPLETED IN OCT 72

DEC 69 - REVIEW OF PRINCIPLES OF ENGINEERING ECONOMY

AUG 69 - BWR TECHNOLOGY COURSE

AUG 69 - REACTOR SYSTEMS CONSIDERATIONS

AUG 69 - NUCLEAR INSTRUMENTATION

AUG 69 - REACTOR THEORY AND ENGINEERING

AUG 69 - BOILING WATER TECHNOLOGY COURSE

AUG 69 - RADIATION PROTECTION

AUG 69 - REACTOR OPERATIONS

AUG 69 - BFN REACTOR THEORY, INSTRUMENTATION, REACTOR OPERATION, RADIATION PROTECTION BWR TECHNOLOGY COURSE

- AUG 69 - BWP PLANT TECHNOLOGY
- JUL 69 - BWR COURSES IN BASIC NUCLEAR THEORY, PLANT SYSTEMS, AND REACTOR SAFETY, BROWNS FERRY NUCLEAR PLANT
- JUL 69 - RADIOLOGICAL HYGIENE
- JUN 69 - BASIC NUCLEAR COURSE
- JAN 56 - STUDENT GENERATING PLANT OPERATOR TRAINING PROGRAM

SEMINARS AND CONFERENCES

- SEP 84 - AIF URANIUM SEMINAR, ATOMIC INDUSTRIAL FORUM, INC.
- AUG 84 - JOINT ANS/ASME CONFERENCE, AMERICAN NUCLEAR SOCIETY
- FEB 82 - SOUTHERN REGION WORKSHOP, INSTITUTE OF NUCLEAR POWER OPERATIONS
- FEB 81 - GENERAL ELECTRIC CONFERENCE VI, GENERAL ELECTRIC
- NOV 68 - MAINTENANCE TECHNICIAN CERTIFICATION, LINERICK TRAINING CENTER

EDUCATION

APPLIED SCIENCE DEGREE IN PROGRESS, UNIVERSITY OF ALABAMA (109 HOURS COMPLETED)

PUBLICATIONS, AWARDS AND/OR PAPERS PRESENTED (WORK RELATED)

- APR 84 - STEERING COMMITTEE MEETING, NUMARC
- APR 84 - NUCLEAR INDUSTRY MANAGEMENT INITIATIVE ISSUES MEETING
- APR 84 - NUCLEAR UTILITY MANAGEMENT AND HUMAN RESOURCES COMMITTEE MEETING
- FEB 84 - ANS 3.1 WORKING GROUP COMMITTEE MEMBER AS OF SEPTEMBER 1982, AMERICAN NUCLEAR SOCIETY
- DEC 83 - SUBCOMMITTEE ON OPERATION AND MAINTENANCE MEMBER AS OF JUNE 1982, ATOMIC INDUSTRIAL FORUM, INC.
- JAN 83 - WATER LEVEL INSTRUMENTATION STRATEGY MEETING, COMMONWEALTH EDISON
- APR 80 - BWR OWNERS GROUP - PARTICIPATED IN DEVELOPMENT OF EMERGENCY OPERATING PROCEDURE GUIDES

CAREER HIGHLIGHTS

- o PARTICIPATION IN THE BWR OWNERS GROUP EFFORTS AT THE INITIAL STAGES OF EMERGENCY OPERATING PROCEDURES.
- o DEVELOPMENT AND PARTICIPATION IN THE ANS 3.1 WORKING GROUP AND THE NUMARC EFFORT. THESE ACTIVITIES HAVE PROVIDED AN OPPORTUNITY TO INPUT PLANT OPERATING EXPERIENCE INTO EFFORTS THAT BENEFIT THE INDUSTRY AS A WHOLE.
- o RECENT INITIATIVES TO ACHIEVE EXCELLENCE IN OPERATIONS OF TVA NUCLEAR PLANTS UNDOUBTEDLY OFFER THE OPPORTUNITY TO REACH THE PEAK OF PERSONAL SATISFACTION OF A LONG TVA CAREER.

SITE DIRECTOR, WATTS BAR NUCLEAR PLANT
WILLIAM T. COTTLE

WORK EXPERIENCE

AUG 84 - PRESENT SITE DIRECTOR, TVA, WATTS BAR NUCLEAR PLANT
APR 84 - AUG 84 PLANT MANAGER, TVA, WATTS BAR NUCLEAR PLANT
SEP 81 - APR 84 POWER PLANT SUPERINTENDENT, TVA, WATTS BAR
NUCLEAR PLANT
FEB 81 - SEP 81 ASSISTANT POWER PLANT SUPERINTENDENT,
OPERATIONS AND ENGINEERING, TVA, SEQUOYAH
NUCLEAR PLANT
SEP 80 - FEB 81 SUPERVISOR, PLANT COMPLIANCE STAFF AND
ISEG, TVA, SEQUOYAH NUCLEAR PLANT
JUN 78 - SEP 80 SENIOR RESIDENT INSPECTOR/REACTOR
INSPECTOR, U.S. NRC
NOV 72 - JUN 78 SUPERINTENDENT OF OPERATIONS/OPERATIONS
SUPERVISOR/ASSISTANT OPERATIONS
SUPERVISOR/TEST ENGINEER, ALABAMA POWER,
FARLEY NUCLEAR PLANT
JUN 68 - AUG 72 U.S. NAVY, LIEUTENANT NAVAL NUCLEAR
PROPULSION PROGRAM

MANAGEMENT TRAINING

JUL 83 - CURRENT ECONOMIC CONDITIONS--HOW WE GOT HERE, WHERE WE ARE
GOING, AUBURN UNIVERSITY
JUL 83 - MANAGING IN AN ENVIRONMENT OF NEGATIVE ATTITUDES, AUBURN
UNIVERSITY
APR 83 - DRUG AWARENESS SUPERVISORY TRAINING
MAR 83 - MANAGING MANAGEMENT TIME

TECHNICAL TRAINING

DEC 84 - STEAM TURBINE GENERATOR DIVISION POWER PLANT PRODUCTIVITY
FORUM, WESTINGHOUSE
MAY 81 - MITIGATING CORE DAMAGE TRAINING
APR 81 - RADIOLOGICAL EMERGENCY TRAINING PLAN
AUG 79 - FUNDAMENTALS OF INSPECTION CERTIFICATION, NRC
DEC 78 - WESTINGHOUSE PWR 4-LOOP FACILITIES TECHNOLOGY TRAINING, NRC

JAN 77 - PWR SIMULATOR COURSE, WESTINGHOUSE

DEC 76 - COLD LICENSE REVIEW, FARLEY NUCLEAR PLANT

MAR 76 - BASIC PWR SYSTEMS COURSE, FARLEY NUCLEAR PLANT

SEMINARS AND CONFERENCES

SEP 84 - TURBINE SYSTEMS IMPROVEMENT, WESTINGHOUSE

JUN 84 - OPERATING PLANT SYMPOSIUM, WESTINGHOUSE

EDUCATION

1968 B.S. EDUCATION, MAJOR IN MATH, AUBURN UNIVERSITY

1974-75 UNDERGRADUATE BUSINESS COURSES, TROY STATE UNIVERSITY

1979-80 MBA PROGRAM, UNIVERSITY OF TENNESSEE AT CHATTANOOGA

PUBLICATIONS, AWARDS AND/OR PAPERS PRESENTED (WORK RELATED)

DEC 84 - AMERICAN NUCLEAR SOCIETY 3 COMMITTEE MEMBER

JAN 84 - FACILITY STAFFING MEETING, NRC

JAN 84 - SOUTHEASTERN NUCLEAR PLANT MANAGERS ASSOCIATION MEMBER

LICENSES/CERTIFICATES

1977 NRC SENIOR OPERATOR LICENSE

CAREER HIGHLIGHTS

- o OVERALL MANAGEMENT OF TVA'S WATTS BAR NUCLEAR PLANT INCLUDING PLANNING AND DIRECTING THE OPERATIONS, MAINTENANCE, ENGINEERING, MODIFICATION, AND ADMINISTRATION OF THE PLANT.
- o AT ALABAMA POWER, FARLEY NUCLEAR PLANT, HELD POSITIONS OF TEST ENGINEER, ASSISTANT OPERATIONS SUPERVISOR, OPERATING SUPERINTENDENT, AND LICENSED AS A SENIOR REACTOR OPERATOR.
- o SERVED AS REACTOR CONTROL DIVISION OFFICER, NUCLEAR PROPULSION. QUALIFIED AS ENGINEERING OFFICER OF THE WATCH ON TWO PROPULSION PLANTS.

The following is taken from a memorandum from H. G. Parris to Those listed dated September 26, 1985:

The purpose of this memorandum is to issue the Power and Engineering (Nuclear) (P&E (Nuclear)) policy to control the making of commitments to NRC, tracking commitments through implementation, and maintaining compliance with commitments throughout plant life.

For the purpose of this policy, a commitment is defined to be a written and docketed statement of TVA actions taken or to be taken by some future date (milestone or calendar date).

Only an owner/operator or the manager of the owner/operator can make or modify a commitment. Verbal commitments should not be made. If during meetings, conference calls, etc., with NRC a commitment statement is made by TVA personnel, it does not become a formal commitment until it is approved and submitted to NRC in writing. Before commitments are made to NRC, the owner/operator shall ensure that the proposed commitment is necessary, accurately defined, evaluated for achievability and effect on existing activities, and sufficient to satisfy regulatory requirements or P&E (Nuclear) policy.

The Nuclear Licensing Branch (NLB) is responsible for formal submittals to NRC. Exceptions to this are Licensee Event Reports (LERs) which are formally transmitted by the owner/operator to the NRC regional office.

The Corporate Commitment Tracking System (CCTS), a computerized data base, will be used to track all NRC commitments. This tracking system will be the only one referenced in discussion with or formal correspondence to NRC regarding commitment tracking.

The owner/operator is responsible for timely completion/implementation of commitments and ensuring that commitments continue to be satisfied, as appropriate, throughout plant life.

The NLB will administer the CCTS for the Manager of P&E (Nuclear) and will develop a program guidance document to implement this policy. Affected organizations within P&E (Nuclear) shall provide to the NLB a single point of contact for coordinating the implementation of these activities by October 7, 1985.

I expect each of you to utilize resources necessary to implement this policy.

The following is taken from a memorandum from W. T. Cottle to Those listed dated October 2, 1985:

In accordance with the memorandum from H. G. Parris to Those listed dated September 26, 1985 (L44 850919 805), attached is the program guidance to implement the policy regarding control over making commitments to NRC, tracking commitments through implementation, and maintaining commitments throughout plant life.

This guidance is effective immediately.

ATTACHMENT

POWER AND ENGINEERING (NUCLEAR) (P&E (NUCLEAR)) PROGRAM GUIDANCE FOR CONTROLLING THE MAKING OF COMMITMENTS TO NRC, TRACKING COMMITMENTS THROUGH IMPLEMENTATION, AND MAINTAINING COMPLIANCE WITH COMMITMENTS FOR THE LIFE OF THE PLANT

Purpose: The purpose of this program guidance is to ensure that commitments to NRC are evaluated, approved, documented, tracked, implemented, and maintained to ensure regulatory compliance. This document provides the guidance and requirements to implement the Manager of P&E (Nuclear) policy regarding controlling the making of commitments to NRC, tracking commitments through implementation, and maintaining compliance with commitments throughout plant life. The program applies (as a minimum) to incomplete commitments and subsequent commitments made to NRC.

Responsibilities

- A. The owner/operator of each TVA nuclear facility is responsible for:
 1. Making and/or modifying commitments to NRC relating to his plant.
 2. Evaluating proposed commitments to ensure that they are necessary, accurately defined, achievable, and sufficient to satisfy regulatory requirements.
 3. Tracking, implementing, and maintaining continued compliance of NRC commitments.
 4. Appropriate coordination of commitment actions with other TVA organizations.
- B. Nuclear Licensing Branch (NLB) is responsible for:
 1. Management of the Corporate Commitment Tracking System (CCTS) data base, including initial entry of commitments into CCTS and assignment of commitment number.
 2. Formal submittal of all commitments to NRC except for LERs which are transmitted directly from the owner/operator to the NRC regional office.
 3. Overseeing implementation of this program for the Manager of P&E (Nuclear).

Definition of Commitment - Written and docketed statement of TVA actions taken or to be taken by some future date (milestone or calendar date).

COMMITMENT CONTROL

Commitment control is necessary to avoid making conflicting and/or unneeded commitments. If proper coordination and evaluation precede the making of commitments, recognition of the total range of implications associated with a particular proposed commitment could result in improved safety and operating performance at the plant sites. For instance, commitments to modify plant systems or operating procedures to accomplish specific purposes may be fully justifiable. However, the side effects of certain changes could cause more overall harm than good. Commitment control will ensure sound decisionmaking before commitments are made.

A commitment evaluation should be made by the responsible organization in the context of Power and Engineering Administrative Instruction II PROJECT MANAGEMENT. The evaluation will provide pertinent information regarding overall impact (cost, training, maintenance, and other resource requirements) associated with implementation of the commitment. Once appropriately documented and evaluated, NRC commitments shall be authorized by approval of the owner/operator.

The NLB will review proposed commitments, except those contained in LERs, before they formally transmit them to NRC to ensure regulatory compliance, adherence to P&E (Nuclear) policy, and appropriate coordination with other organizations.

CORPORATE COMMITMENT TRACKING SYSTEM (CCTS)

This program tracks commitments made to NRC in formal correspondence. If formal commitments are made to NRC in a meeting, telecon, etc., they must be documented in a letter to NRC. Each commitment shall be clearly documented on a commitment verification and completion form. The form must accompany the commitment being transmitted to NLB for formal submittal to NRC. If a commitment is made in an LER which is formally transmitted directly from the owner/operator to the NRC regional office, a copy of the transmittal along with a commitment verification and completion form will be sent to NLB. (This requirement does not apply to informal or incidental agreements made in the course of day-to-day dealing with resident or regional inspectors.)

NLB is responsible for the proper coordination within IVA of correspondence which it transmits to NRC. NLB will ensure that commitments to NRC are properly identified and the organization designated as responsible for implementation agrees with the commitment before it is officially released to NRC. Once the correspondence transmitting the commitment has been released to NRC, NLB will input the initial data for each commitment into the CCTS and assign the commitment number.

The owner/operator of each nuclear facility will designate a person/functional group (hereafter called "designated contact") to be responsible for coordinating with NLB and maintaining the CCTS. The owner/operator will be responsible for implementing procedures and performing the following functions: (1) making periodic updates and

identifying the new items that have been added to the system for which they are responsible, and (2) reviewing the commitment(s) and ensure appropriate assignment(s) has been made in the CCTS to the organization(s) responsible for implementing the commitment. If the owner/operator finds an error in the assignment or actions, NLB will be immediately notified. NLB will coordinate with the designated contact the reassignment of the commitment or modification of the commitment action. Where conflict exists that cannot be resolved with the designated contact, appropriate management will be contacted to resolve the issue.

The owner/operator is responsible for maintaining appropriate program records associated with commitments. Program records should contain the following types of information.

- a. Documented acceptance of responsibility for implementation of the commitment by section/group within his organization.
- b. Copy of document which initiated the commitment.
- c. Any documentation necessary to report status and completion of commitment.

The owner/operator should generate periodic status reports to be sent to the implementing organizations advising them of all their open items. The owner/operator will be responsible for maintaining the current status of commitments on the CCTS. If an implementing organization cannot meet a commitment date, appropriate management (i.e., owner/operator) must be notified and a determination of action to be taken made. NLB must be notified immediately of changes to commitments or upon discovery that a commitment cannot or will not be met on time. The action to be taken and new completion date will be documented in a letter from NLB to NRC.

When the responsible organization completes the action to meet the commitment, the Commitment Verification and Completion Form must be filled out and signed by the responsible manager describing the action taken to complete the commitment. The owner/operator inputs information (action taken to complete commitment, completion date, person who signed form, and RIMS number of completion form) into CCTS. A copy of the commitment verification and completion form should be kept for the plant files and the original sent to RIMS. NLB will periodically issue reports showing numbers of commitments made, completed, and closed by each organization.

When completed or implemented, a commitment will remain in the "completed" status on the CCTS until documented closure of the item is complete. After NRC and/or TVA close the item, NLB will change the "completed" status to "closed" and reference the closure document in the Remarks section of the CCTS.

Maintaining Commitments

Each owner/operator is responsible for ensuring that continued compliance with commitments is maintained. The programmatic controls for commitment compliance will be developed/maintained at the discretion of the owner/operator.

Requests for changes/improvements to these guidelines will be submitted to NLB. NLB will evaluate the proposed changes and coordinate with all affected organizations before issuance of changes that affect the intent or responsibilities as stated in these guidelines.

Attachment A

COMMITMENT VERIFICATION AND COMPLETION FORM

PART I. COMMITMENT NUMBER: _____
COMMITMENT MADE TO: _____ (Organization)
COMMITMENT DUE DATE: _____
RESPONSIBLE ORGANIZATION: _____
COMMITMENT DESCRIPTION: _____

SIGNATURE: _____ DATE: _____

PART II. COMMITMENT COMPLETION DATE: _____
ACTION TAKEN: _____

SIGNATURE: _____ DATE: _____

PART III. VERIFICATION

_____ Supervisor	_____ Date
_____ CCTS Updated	_____ Date

TENNESSEE VALLEY AUTHORITY
DIVISION OF QUALITY ASSURANCE INSTRUCTION

No. DQAI-104 Rev. 0

Title: ESCALATION OF RESPONSIBILITY FOR DEVIATION
 CORRECTIVE ACTION

	Revision: R0	R1	R2	R3	R4	R5	R6
Date: 9/25/85							
Prepared By: Quality Audit Branch	<i>Robert W. Brown</i>						
QA Review:	<i>D. L. Sliger</i>						
Concurred QAB:	<i>P. Moore</i>						
Concurred OQAB:	<i>W. C. Anderson</i>						
Concurred QSB:	<i>James E. Lane</i>						
Concurred PEB:	<i>J. A. Custer</i>						
Approved Director QA:	<i>R. J. Mullin</i>						
Endorsed Manager P&E (Nuclear):	<i>H. H. Parma</i>						

ESCALATION OF RESPONSIBILITY FOR DEVIATION
CORRECTIVE ACTION

Title: _____

No. DQAI-104

Rev. 0

1.0 PURPOSE

To provide a systematic method of involving successively higher levels of DQA and line management in a process to achieve prompt and effective corrective action related to conditions adverse to quality. Also, to assign to successive levels of DQA management the responsibility for ensuring that line managers are aware of the current status and have the necessary background information related to the citation to facilitate their understanding of the problem and needed corrective action.

2.0 SCOPE

This procedure applies to all identified corrective action reports (CARs) and audit deviations wherein a DQA manager, QA evaluator or QA engineer determines that:

- (a) corrective action or the proposal thereof is not being accomplished in a timely manner.
- (b) agreement cannot be achieved for appropriate corrective action, or
- (c) corrective action taken is inappropriate and/or inadequate for the cited condition and resolution with the responsible organization is not being obtained.

3.0 REFERENCES

- 3.1 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action"
- 3.2 DQAI-312, "Quality Audit Program - Quality Audit Branch"
- 3.3 NQAM, Part III, Section 7.2, "Corrective Action"
- 3.4 DQAI-204, "Handling of Central Office Corrective Action Reports and Discrepancy Reports"
- 3.5 DQAI-411, "Quality Audit Program - Procurement Evaluation Branch - Engineering and Construction Evaluation Group (PEB-E&CEG)"
- 3.6 DQAI-413, "Quality Audit Program - Procurement Evaluation Branch - Procurement and Support Services Evaluation Group (PEB-PP & SSEG)"

4.0 ABBREVIATIONS AND DEFINITIONS

- 4.1 Audit - A formal, independent examination with intent to verify conformance with established requirements
- 4.2 Corrective Action - Those measures taken by the responsible organization (cited organization) to correct and prevent a recurrence of the identified deviation
- 4.3 Corrective Action Report (CAR) - A report used by organizations other than QAB to document noncompliance in accordance with reference 3.3.
- 4.4 Deviation - Any noncompliance or nonconformance identified and documented by the auditing organization
- 4.5 E&CEG - Engineering and Construction Evaluation Group
- 4.6 Noncompliance - A deviation from or violation of established regulatory drawing, or procedural requirements
- 4.7 OQAB - Operations Quality Assurance Branch
- 4.8 PEB - Procurement Evaluation Branch
- 4.9 P&E - Power and Engineering
- 4.10 PEG - Plant Evaluation Group
- 4.11 PP&SSEG - Plant Procurement and Support Services Evaluation Group
- 4.12 Plant QA Staff - An element of OQAB located at the nuclear plant site
- 4.13 PSS - Planning and Support Staff
- 4.14 QAB - Quality Audit Branch
- 4.15 QA Evaluator - An individual trained, qualified, and certified as an auditor or lead auditor
- 4.16 SS PGM - Support Services Programs Group
- 4.17 Surveillance - A formal act requiring the physical presence to monitor by observation the designated activities to assure that they are performed in a specified manner
- 4.18 VIAS - Verification Improvement Administration System, used in the audit program to status and track audit deviation reports.

5.0 RESPONSIBILITIES

- 5.1 The Heads, SS PGM, PEG, PP&SSEG and E&CEG shall conduct regular follow-up actions or assign QA evaluators to conduct follow-up actions for each audit deviation identified in order to monitor response timeliness and corrective action progress as well as to verify the accuracy and adequacy of completed corrective actions.
- 5.2 The Supervisor, Plant QA Staff shall ensure that verification of corrective actions required by CARs are conducted to establish the timeliness, accuracy, and adequacy in accordance with the site specific procedures.
- 5.3 The Head, Programs Applications Group shall ensure that verification of corrective actions required by CARs against offsite organizations are conducted to establish timeliness, accuracy, and adequacy in accordance with reference 3.4.
- 5.4 The Chiefs, QAB, QSB, and PEB; and Supervisors, Plant QA Staffs shall each provide a program coordinator(s) who shall be responsible for establishing a system for tracking and identifying the current status of deviations and CARs. This may be accomplished using VIAS.
- 5.5 The Chiefs, QAB, QSB, and PEB; and Supervisors, Plant QA Staffs shall forward to the Director, DQA, a memorandum of escalation and a copy of Escalation Report (Attachment 1) when it is determined that the escalation criteria of section 6.1.2, or when appropriate, section 6.1.1, has been met.
- 5.6 The Director, DQA shall arrange for regularly scheduled meetings with appropriate directors and managers and, as warranted, call special meetings to effect resolution of deviations or CARs. The Director shall also escalate problem resolution to the Manager, P&E, when justified by corrective action performance.

6.0 PROCEDURE/REQUIREMENTS

6.1 Escalation Criteria

6.1.1 Audit deviation reports or CARs may be escalated within DQA for resolution by successive levels of management up to the Director, DQA, when any of the following steps in the corrective action process do not occur as required:

6.1.1.1 Response to the report is not received by the requested due date or within 30 or 35 calendar days (for CARs and audit deviation reports, respectively) whichever is the earliest.

6.1.1.2 The corrective action response from the responsible organization is not adequate either in plan or schedule.

6.1.1.3 Corrective action implementation does not proceed as committed to in the responsible organization's approved corrective action plan and schedule.

6.1.1.4 Verification of corrective action completion discloses that the corrective action has not been completed as stated.

6.1.2 CARs and audit deviation reports SHALL be escalated for resolution by the Director, DQA, under the following circumstances:

6.1.2.1 When the significance of the noncompliance or associated corrective action warrants early involvement by the Director, DQA.

6.1.2.2 Response to the audit deviation report is not received within 50 calendar days of the audit report date or the response for a CAR has not been received within 45 calendar days (30 days for CARs determined to be significant).

**ESCALATION OF RESPONSIBILITY FOR DEVIATION
CORRECTIVE ACTION**

Title: _____

No. DQAI-104

Rev. 0

- 6.1.2.3 When the responsible DQA organization has determined the initial and second response to the noncompliance report to be unacceptable.
- 6.1.2.4 Upon receipt of a second request from the cited organization to extend the original corrective action completion date.
- 6.1.2.5 If, after the committed date to complete corrective action (C/A) has elapsed, it is determined that the C/A is incomplete or unacceptable based on the results of a second follow-up (or the first follow-up after an approved extension to the C/A commitment date).
- 6.1.2.6 When direct contact by the responsible Group Head, Plant QA Staff Supervisor, the assigned QA evaluator, or the Chief, QAB, QSB, or PEB fails to achieve the results required by either the QA audit program or CAR procedures for responsiveness, timeliness, corrective action, or recurrence control.
- 6.2 The assigned program coordinator is to review the status and tracking program data on a routine basis (weekly or daily) and, as applicable, update the current status of each noncompliance. The program coordinator shall also complete a status and tracking program entry to record each escalation of a noncompliance.
- 6.3 In accordance with references 3.2, 3.4, and 3.5 requirements, the responsible Plant QA Staff Supervisor or group head in QAB, QSB, or PEB shall respond to requests from the program coordinator for the conduct of follow-up and the evaluation of noncompliance (audit and CAR) responses. Additionally:

ESCALATION OF RESPONSIBILITY FOR DEVIATION
CORRECTIVE ACTION

Title:

No. DOAI-104

Rev. 0

6.3.1 The responsible supervisor or group head, in accordance with references 3.2, 3.4, and 3.5 or plant site procedure, shall conduct or assign regular, ongoing, follow-up reviews for each open noncompliance report and associated corrective action. As necessary, direct contact with section and group managers at the facility or activity location shall be made concerning the required actions. Escalation shall be used consistent with paragraph 6.1. Actions taken shall be documented and submitted to the program coordinator.

6.3.2 When the Plant QA Supervisor; group head in QAB, QSB, or PEB; or QA evaluator has indicated escalation may be necessary based on the guidance of section 6.1.1, the Plant QA Staff Supervisor and Chief, QAB, QSB, or PEB shall make direct contact with the organization manager responsible for submitting responses (the normal signatory, e.g., site director or organization/facility manager). This contact will be to elicit a documented agreement (memorandum) as to the resolution or disposition of the noncompliance in question. The results of this contact shall be documented and submitted to the program coordinator.

6.4 If the action required by sections 6.3.1 and 6.3.2 proves unproductive or the criterion of section 6.1.2 is met, the appropriate Plant QA Staff Supervisor or group head in QAB, QSB, or PEB shall promptly prepare a memorandum for the signature of the Chief (QAB, QAB, QSB, or PEB, NOTE: In the case of CARs, the plant QA staff supervisor may sign for the chief, QAB), as appropriate, to the Director, DQA, recommending the escalation of responsibility for the required corrective action to the next appropriate level of line management (this will be site director

ESCALATION OF RESPONSIBILITY FOR DEVIATION
CORRECTIVE ACTION

Title: _____

No. ~~DQAI-104~~

Rev. 0

for plant noncompliances) within the participating organization. The memorandum should trace the chronological history of past communications on the subject noncompliance and, if appropriate, the DQA branch's position, reason for past rejections, and/or the basis for escalating corrective action responsibility. A copy of Attachment 1 shall be affixed to the memorandum. A copy of the memorandum and Attachment 1 shall also be submitted to the program coordinator for the audit or CAR file, as appropriate.

- 6.5 The Director, DQA, in response to the memorandum, shall initiate an immediate special meeting with the appropriate level of management if in his judgement it is warranted by the severity or importance of the noncompliance to QA program, license commitments, or safe operation of a nuclear unit. The Director shall arrange to discuss and resolve the situation in a manner that will result in a definitive course of action designed to disposition the noncompliance report with satisfactory corrective measures, or in exceptional cases, a documented acceptance of the existing condition by the affected manager where TVA policy permits. For other noncompliances with less immediacy, the Director, DQA, shall arrange to discuss the item at regularly scheduled meetings which for nuclear plant sites occur at approximate quarterly intervals.
- 6.6 The Director, DQA, has the authority to approve only one escalation corrective action plan and schedule. If unable to achieve acceptable disposition of the noncompliance as a result of the actions described in section 6.5 or if commitments made are not met, the Director, DQA, shall promptly request the Manager, P&E, to participate in a conference with the DQA Director and the affected manager to resolve the noncompliance.

ESCALATION OF RESPONSIBILITY FOR DEVIATION
CORRECTIVE ACTION

Title: _____

No. DQAI-104

Rev. 0

- 6.7 The Director, DQA, shall forward to the appropriate program coordinator a completed copy of the Escalation Results Report, Attachment 1 that describes the agreed disposition of the noncompliance report(s) achieved as a result of the actions required by section 6.5 or 6.6.
- 6.8 The Plant QA Staff Supervisor or Chief (QAB, QSB, OQAB or PEB) shall notify the Director, DQA, whenever commitments achieved as a result of the meeting of sections 6.5 and 6.6 are not met by the cited organization, providing him a copy of the previous escalation memorandum and Escalation Results Report.
- 6.9 The program coordinator shall ensure applicable documentation including the memorandum to the Director and documentation of meeting results (Attachment 1) provided by the Director, DQA, or Manager, P&E, are filed with the appropriate noncompliance report record ensuring that each document identifies the affected deviation. These documents shall be processed as QA records. When notified that the noncompliance is closed, the log entry (or VIAS, if used) shall be marked accordingly.
- 6.10 Copies of correspondence between DQA and audited organizations related to specific audits and/or associated corrective actions shall be directed to NSS.

7.0 ATTACHMENT

Attachment 1, Escalation Results Report

Attachment 2, Escalation Flow Chart

Title: ESCALATION OF RESPONSIBILITY FOR DEVIATION
CORRECTIVE ACTION

No. DOAI-104

Rev. 0

ATTACHMENT 1
ESCALATION RESULTS REPORT
(Instructions on Page 2)

REQUESTOR

Audit Deviation Report

Corrective Action Report

Report Identifier: _____

Escalation Memorandum RIMS No.: _____

Signed: _____ Date: _____

DIRECTOR, DQA

Contact: _____ Date: _____

Disposition: _____

_____ Completion Date: _____

Interim Action (if applicable): _____

_____ Completion Date: _____

Signed _____ Date: _____

MANAGER, P&E

Contact: _____ Date: _____

Disposition: _____

_____ Completion Date: _____

Interim Action (if applicable): _____

Signed _____ Date: _____

**ESCALATION RESULTS REPORT
INSTRUCTIONS**

The requestor shall:

1. Check the type of report being escalated.
2. Provide the unique identifier of the report (i.e., the identifier applied to either the CAR or audit deviation report.).
3. Provide the RIMS number of the escalation memorandum containing the problem's history and the DQAI paragraph number serving as the basis for escalation.
4. Include both pages of this report as an attachment to the escalation memorandum.

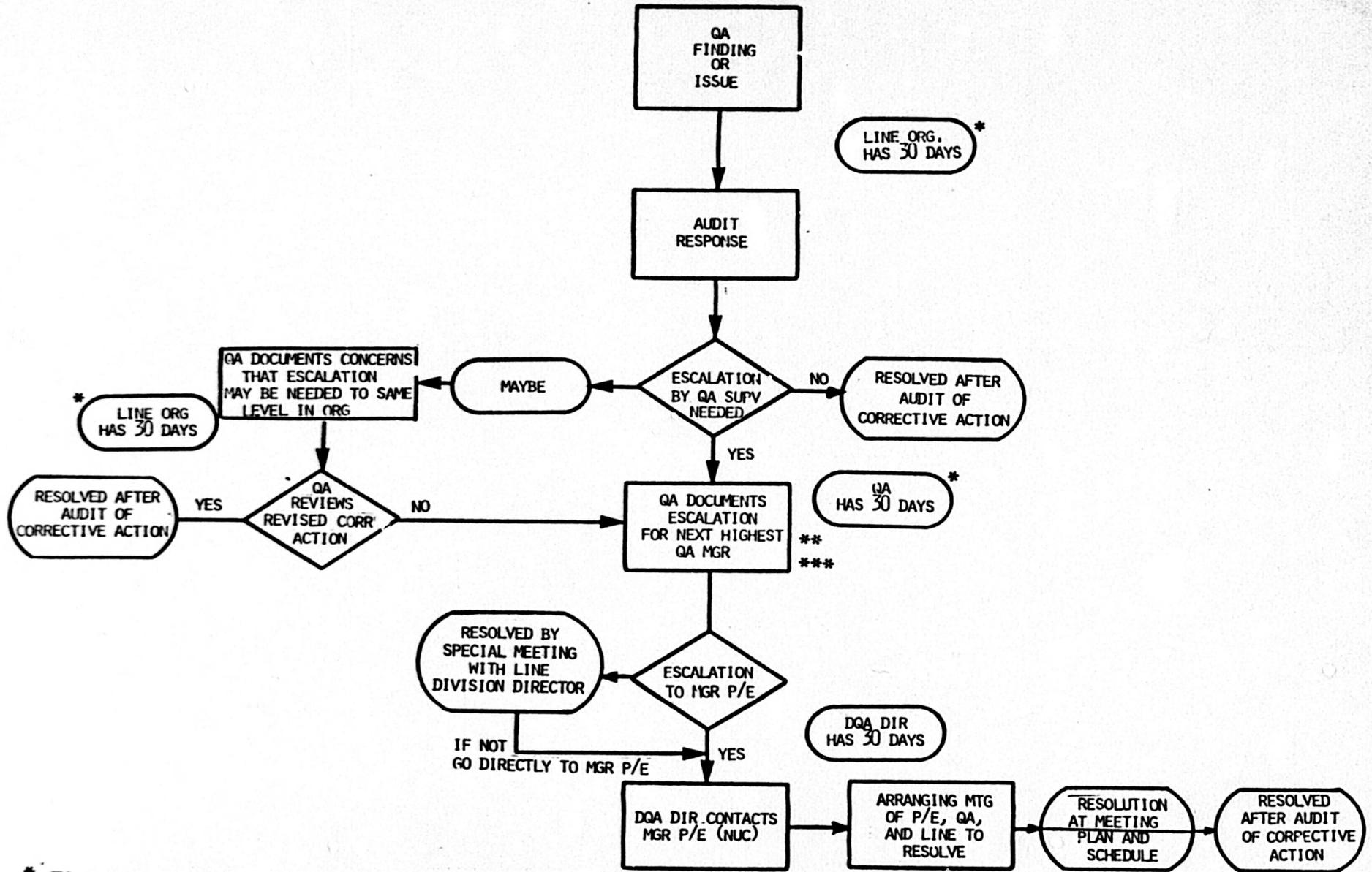
The Director, DQA shall:

1. Identify the individual contacted regarding resolution of the problem on the subject report.
2. Provide the specifics of the agreement achieved with the contact regarding the disposition of the problem, e.g. the corrective action (if different from that previously accepted by the auditor) and accepted completion date.
3. Provide the specifics regarding any interim corrective action measure to be implemented and its completion date, when such action is warranted and agree upon.

The Manager of Power & Engineering (P&E) (or designee) shall:

1. Provide the same information as that required of the Director, DQA.

SIMPLIFIED ESCALATION FLOW CHART



- * 30 DAYS OR LESS - DEPENDING ON SIGNIFICANCE
- ** ESCALATION CAN ALWAYS GO DIRECTLY TO DIRECTOR, DQA - DEPENDING OF SIGNIFICANCE
- *** DIRECTOR DQA HAS AUTHORITY TO APPROVE ONLY ONE ESCALATION CORRECTIVE ACTION PLAN AND SCHEDULE

SECTION 7.0

ACRONYM GLOSSARY

ACRONYMS

A&I	Additions and Improvements
ANS	American Nuclear Society
ANSI	American National Standards Institute
BFN	Browns Ferry Nuclear Plant
BLN	Bellefonte Nuclear Plant
CAR	Corrective Action Report
CATS	Commitment Action Tracking System
CCTS	Corporate Commitment Tracking System
CEO	Corporate Executive Officer
DQA	Division of Quality Assurance
ECP	Employee Concerns Program
EQ	Environmental Qualification
ERT	Employee Response Team
FSAR	Final Safety Analysis Report
FY	Fiscal Year
GET	General Employee Training
IE	NRC'S Office of Inspection and Enforcement
IEB	IE Bulletin
IEN	IE Notice
INPO	Institute of Nuclear Power Operations
IST	In-Service Testing
LER	Licensee Event Report
M&TE	Measuring and Test Equipment
M-12	Management Pay Level 12
MAS	Management Appraisal System
MDSS	Management Development Support System

MTMM	Monthly Top Management Meeting
NCR	Nonconformance Report
NLS	Nuclear Licensing Staff
NQAM	Nuclear Quality Assurance Manual
NSRS	Nuclear Safety Review Staff
NUC PR	TVA Office of Nuclear Power of Power & Engineering
NUMARC	Nuclear Utility Management and Human Resources Committee
O&M	Operations and Maintenance
OC	Office of Construction
OE	Office of Engineering
P&E	TVA Power and Engineering (Nuclear)
PMT	Post Modification Testing
PORC	Plant Operations Review Committee
PORV	Power Operated Relief Valve
POTC	Power Operations Training Center
PRT	Pressurizer Relief Tank
PZR	Pressurizer
QA	Quality Assurance
QAB	Quality Audit Branch
QC	Quality Control
QMS	Quality Management Staff
QTC	Quality Technology Corporation
SALP	Systematic Assessment of Licensee Performance
SI	Surveillance Instruction
SQN	Sequoyah Nuclear Plant
SRO	Senior Reactor Operator
TI	Technical Instruction
WBN	Watts Bar Nuclear Plant