A specific project manual was required for each project or site that described project's unique requirements in the engineering area.

In developing these procedures we looked, as I said, at architect engineers' systems and in looking at those we developed what we thought we wanted in an engineering control package.

(Slide.)

We took our old procedural system and looked at the hard requirements to see if we had looked at those in the new procedures and we did a matrix against the requirements of appendix B.

We feel pretty confident and proud of the system that we developed.

Shortly after June to address these -- I guess I'd like to address the two time period separately, the design control -- we asked Gilbert Commonwealth to perform an evaluation of the design control that's in place currently. They completed a review of the system and they concluded that the system for design control is adequate with three exceptions and they suggest three enhancements.

(Slide.)

The first exception stated up there deals with plant configuration. I think TVA had recognized a need, and Gilbert Commonwealth confirmed that we needed to

improve the feedback of as-conducted data to the official configuration drawings of the plan. We have initiated a program incorporating what we call a design change supplement to improve this process. Basically what this is, it allows us to have one official as-constructed record and the design supplement will control unimplemented designs from the period they are designed until they are implemented and as constructed.

Commonwealth, in the next area, identified a need to more formally identify the design basis at the beginning of the change. As a result we have added additional requirement documentation in addition to the design basis to our procedural system in the form of a detailed checklist. That's completed in the early parts of a task.

MR. THOMPSON: In identifying these exceptions, what was the significance of when they did that? That is, if you look back on what they did, with the exception of this -- what was the significance of this exception? Did it result in design controls that you don't have confidence in? Or how would you characterize that?

MR. CANTRELL: I'm going to try to characterize them after I cover this last one.

The USQDs were not formally required to be updated after the time of implementation, we agreed with

all the exceptions and we have changed our procedures and required the USQDs to be formally kept current with the status.

To comment on each of these exceptions in order: In the first area of plant configuration -- well, in the area of plant configuration we feel that we have a system of management controls that controls the process from the period of design through the implementation phase and closing back out, where we found that the period was getting -- was too long, in that load and the control was not what we felt like it should be nor what they felt it should be. I think there are some exposures in that that we need to go in and look and evaluate the work that has been done up to that. I'll cover that in just a minute.

The acceptance criteria we feel like that we had design basis and we addressed those. This comment was that they felt like, that we should document those more rigorously so we could close them at the start of the day.

The USQD, in that area, the engineers who made the changes were knowledgeable and basically used the data and assumptions and statements of USQD as they developed the designs and they were cognizant to conform to the terms of the USQD. Our shortcoming is we did not keep USQD as a living document as that went through. Similarly, field tests were approved by the original designer of the system,

so it is -- the design was implemented in the field and redesigns or modifications were needed to respond to field change requests. The original designer who also was a party to the USQD process, was charged with not violating the provisions of the USQD.

The design drawings and specifications for an engineering change notice in our system are translated into detailed work plans by the constructor or implementor. These plans, in their sequence, are reviewed by the plant operations review committee.

There was also a process of Sequoyah that reviewed unimplemented work plans prior to restart. So we feel that the areas are sound, the criticisms are valid, and that we need to bring the program to -- to address those in our program. But we also conclude that we have to do some additional checking.

As part of our operational readiness review we will be reviewing and are reviewing the current configuration of the plant for suitability for operation, including the confirmation that an unreviewed safety question does not exist.

So, I didn't know whether that talked around what you were asking or not.

MR. THOMPSON: Yes. I think it did.

MR. CANTRELL: Let me try to address it a little

more succinctly then. We think we had controls. We think the controls were effective. We think that they have raised an issue that causes us to question the sharpness of that plan and, therefore, we feel an obligation to take the configuration at this point in time in light of these exceptions and to do, along with the operational readiness review, a reverification that we are not in an unreviewed safety question condition.

MR. THOMPSON: And all safety systems or all systems that were subject to design modification during this period? Is that what you are going to do? I'm trying to understand.

MR. CANTRELL: What we've got is a group of unimplemented designs and/or as-constructed data. We'll look at the as-constructed data and those portions of the designs that are unimplemented and see what bearing they have on the USQD determinations that have been made.

MR. DENTON: How big an effort would this result in?

MR. CANTRELL: It's going to be a pretty big effort. There's a lot of ECNs out there. There's not as many safety related ECNs as you might think. Most of the critical safety systems have had a minimum review to them, from the time of plant operation and original OL to plan. But it's a process that we are trying to get our arms

around and we could schedule that.

MR. DENTON: So this is something you see that's necessary prior to restart?

MR. CANTRELL: It's something that we feel we need to do in order to specify the plant was ready for restart.

MR. THOMPSON: Well, we were working with the region on this as part of their review and we were asking to try to get a better focus on the other hand it so we know what you are going to do so we know whether to monitor and inspect and monitor this.

What I would like to see is some better definition of what you plan to do and what your schedule is on this. Roger, I guess --

MR. WALKER: I'm in concurrence with him. What we need to know is what is the sample you are looking at and how do we relate that to whether the comprehensiveness of the plant and the DCNs that are out there. And then we need to know when you are going to be at a point that we can take a look at it in a physical sense.

MR. CANTRELL: I would like to get into the enhancements. They consider the enhancements, we have brought in, an attempt to upgrade the equipment on our system. We have modifications that are on the way to do that.

MR. DENTON: The first is to have the site talk to the engineering office. We have all heard that recommended.

MR. CANTRELL: Yes. It worked.

MR. THOMPSON: Is that in your area of responsibility to enhance those communications? I think really that's something we may kind of consider fundamental, quite frankly. And it's an area that needs to get down to the interrelationships of both offices; separated by distances and so reluctance to communicate is just -- not tolerable.

MR. CANTRELL: We have been communicating in that area. We have been working in that area. We have a system that ties the technical sites back to the home office so that they will communicate. They are being brought together to communicate and they have an obligation on technical issues to do generic reviews and so forth.

I think what I see is a need to make that work smoother and faster. I think we get the communication done with things like: We changed our corrective action reports to make it more timely, as far as doing generic reviews and things like that. I think really what this amounts to is recognizing that an issue at a site may not be generically applicable to anything else but the experience learned at that site needs to be relayed back so we can get a cross

pollenation. I think if it's a clear safety issue we have it pretty well covered but we need to keep at it and keep the lines open.

MR. DENTON: It seems engineering did not take a broad enough review of the engineering charter. Engineering was the thing out there and if it didn't work right, it was the field's problem.

MR. CANTRELL: I think the criticism is fair. I have seen it in both our organizations and other areas where you have interfaces, organizational interfaces, there is a tendency without an upper management guidance to make sure that communication is not only received but understood and implemented.

MR. DENTON: But with your resources if you ever start operating again I would hope you would do root cause analyses and keep them from returning. That seems to be the secret in running a safe and reliable plant is a detailed engineering look at what failures you have had.

MR. CANTRELL: I agree. Yes?

MR. WALKER: The sample that you are doing, will it confirm the adequacy of the design and the adequacy of the implementation of the design to the ECF process?

MR. CANTRELL: You are one slide ahead of me.

MR. WALKER: Okay.

MR. CANTRELL: But I don't have a slide.

(Laughter.)

I covered the period in the report that we had covering the system that's in place now. From '75 to '85 there was another system in place, the 200 procedural system. We have asked Gilbert Commonwealth to perform a review of the work performed under that control process.

The scope of that will be to consist of modifications performed since OL, and Gilbert Commonwealth, the review of compilation of all modifications since the OL, sorted by system.

Gilbert Commonwealth will select at least two systems, but whatever they feel is representative, and will evaluate the Sections' systems for the effect on system operation, conformance with the original design basis and interface with other plant systems and structures. They will also evaluate the system in light of the exceptions that they found in the present system.

Another thing that's going to make it difficult is we are going to operate from June on with the most recent system, so the figures come out now are the ones we'll have to use to fine-tune and find out what programs exactly we need in full. But we will address that data and do whatever sampling or reconfirmation it takes to retain confidence to at least lay out the plan we are starting out with.

MR. DENTON: Can you help me with how serious an issue this is? Is this liable to be a critical path item? Bigger than EQ issues? I don't have a feel for what underlies this.

MR. CANTRELL: I guess, Harold, my opinion is that we have had a design control process, that it has been effective; that we have identified over the years some holes, organizational holes as well as procedural holes in it and I think that in the atmosphere we are in now and our ability to do things to get our act together and perform well, we want to be sure that the plant we start back up is well defined and well understood by us.

MR. DENTON: Can I interpret from that you will reestablish design configuration, configuration control will be reestablished here for the systems you felt you had doubts about?

MR. CANTRELL: We feel we have configuration control. Configuration control is too broad a word for me to allow you to just state that way. We feel we have configuration control. We feel that we need to do a reconfirmation and a base line of our own self because we are beginning to put it under more stringent control as we move off.

MR. DENTON: I guess to follow what Roger and everybody said, seemingly you need to do this sorting by

system so we get a feel for what kind of systems you are talking about out there and how important they are to safety and what kind of things are necessary.

MR. TAYLOR: Let me ask you a hypothetical. If we came in and looked at a safety system that you modified, changed the safety valves or solenoids, et cetera, if we found you had the original design documents sufficiently documented that in instituting the change you would have gone back to the original design, done the calculations, recording those and approving the change? You know, this is the process, the original design, timing, you want to bypass -- would you go back and find that you had consulted the original pipe sizer at that point? Or have you?

MR. CANTRELL: I'm not sure you would have found documentation if it would have been an area that didn't require recalculation if that was a calculation that was checked. What you would find was the basis, but what was done --

MR. TAYLOR: Why you didn't have to go back to the calculation?

MR. CANTRELL: What you'd find is more positive statement rather than a deductive statement. This is what we did on this job, major issues that we raised.

MR. TAYLOR: Okay. Seen other people get in trouble here. I realize I'm asking a hypothetical question.

MR. CANTRELL: Our process basically took a change, put a scope on it and it said what we would do and what documents would be addressed by that change. It was gone through an interdisciplinary review to see that everybody had their impetus in there, as those documents were prepared and released the system, the paperwork system was closed out of design phase to say that we had completed that change.

MR. THOMPSON: As I understand, there is a time request that you need to leave about 10 minutes from now so I guess I would like to say we probably have 10 minutes. I guess one item I would like to do this evening, since it's a major concern that hasn't been identified or addressed right now, and also I would like to have the project manager go over the five or six items that you think you've kind of made a commitment to today in the meeting as well as some of the things that we were going to follow up on.

MR. DENTON: We should all recognize, and we document our views on this, some will come out there and then EQ will come out when you are ready for EQ, feeling that we have necessarily done the review. All we have done is getting information needed to do the review. So that's why we have such a good Staff in the agency, that do the work. This helps us understand how to allocate the resources for these areas but it doesn't say we have

reviewed them.

MR. THOMPSON: Have you made statements to the effect that NRC has approved any of the submittals to anyone? Any people or anything like that?

MR. PARRIS: No.

MR. THOMPSON: The rumors have been that that had been made.

Carl, do you want to -- if he misses any, please -- we've the transcriber to make sure.

MR. STAHLE: Let me lead the discussion. The first Mr. Denton brought up, the consideration of the DPOs, the matter of difference of professional opinions and a consideration of putting that within the TVA system, particularly a mechanism for tacking and its resolution.

The second item here which Mr. Taylor brought up was a consideration of the testing requirements which was discussed, and how you need noise for approximately MOVs, which were required here. I think this was related to startup and the degree of testing, as a -- there's a bullet.

MR. ABERCROMBIE: 85.033.

MR. STAHLE: The third consideration is the matter brought up here on -- to get the QTC comments on the employee concerns program. I believe you are considering this.

MR. MASON: Yes.

MR. STAHLE: The fourth is the submittal of data on the QA program.

MR. THOMPSON: That's what Chuck Mason was talking about.

MR. MASON: We'll give you a submittal saying we are going to retract our timetable on that thing.

MR. THOMPSON: Clearly where we understand the reporting authority is with respect to the QA program.

MR. STAHLE: The next item is the assurance that the wrongdoing investigations reports be made available to the NRC.

The last item as far as commitments or considerations here was the discussion we just had, I've translated to some extent here, an understanding or a better understanding of what's going on in design control process and a more -- better understanding, at least from my point of view, of the impact this may have on the Sequoyah schedule. I have heard nothing addressed at this point on schedules. I think this is a matter that we want to hear more about.

The other of course I'll look at what NRC will likely be doing is, one, with respect to the EQ testing, the rockbestos cables, probably do some monitoring as to the vendor that's doing the testing and the adequacy of that program.

The the second item here, NRC, schedule a meeting, I guess, to review your safety criteria that's going to be used in your employee concerns program. I guess an understanding -- and maybe an acceptance of the kind of criteria that was being utilized.

That's it for the items that I was able to pick up. There are other commitments, understandings -- if there are I'd be glad to know.

MR. ABERCROMBIE: The rockbestos, that's a materials testing and not a full blown cables test program.

MR. STAHLE: Principally on the radiation -- yes, I understand it now.

MR. THOMPSON: We'll probably document it, in a letter, our concerns a little better articulated on the design control program. I think that will help focus your attention and our concerns.

MR. STAHLE: Are there any other comments that I may have missed in terms of commitments? Things that you are considering

MR. DENTON: That seems to capture the major ones. Hugh, do you want to suggest any major ones for you or us?

MR. PARRIS: No. Chuck?

MR. MASON: No.

MR. COTTLE: The position description of senior

nuclear advisor --

MR. STAHLE: Yes.

MR. THOMPSON: I thought we asked for that before. I'm sure we had. When we were were in Chattanooga we asked that be defined in the minutes, the IDs minutes of that meeting but again, we'll ask for it again.

MR. MASON: You are asking for more now. We put a definition. Harold is asking for a job description.

MR. PARRIS: I interpret that as being something different but, you, apparently, didn't. So let's be sure we understand it.

MR. TAYLOR: We want to clearly now what responsibilities, duties,,et cetera --

MR. DENT: What his duties are, whether part-time, full time --

MR. THOMPSON: Have you all decided that yet? At one time I didn't know whether he was going to be full time or part-time, located in Knoxville or Chattanooga

MR. DENTON: If there are no more issues, if anyone wants to have a last say, especially anyone who is not a party, any person of the public that would like to comment?

Henry, I'll give you a chance if you would like to say anything.

MR. MYERS: The submittal with the employer response program, it discussed, I think, some of the

concerns raised about Sequoyah and how they had been resolved one section, I believe, in that report. Has QTC, or whoever brought those to your attention, been asked as to whether they agree with the write-up in that document? I think it talks about anchor bolts and a couple of other things in that document. I can point it out to you. It talks about welding, instrument slope -- has QTC been asked to comment on that? In that write-up?

MR. ABERCROMBIE: That's basically a description of ongoing evaluation and investigation.

MR. COTTLE: Not to my knowledge unless it was done through the --

MR. MYERS: Reading that I thought it was meant that these were not issues anymore.

MR. PARRIS: That's certainly not the intent. Quite the contrary.

MR. MASON: There are three categories that came up at Watts Bar that we are looking at at Sequoyah. Welding programs.

MR. DENTON: My understanding is the information you are sending me in response to my letter to you is that if QTC writes a letter disagreeing with the NSRS resolution of an item, you send me that, too.

MR. YOUNGBLOOD: Or anybody in management. Or anywhere.

MR. DENTON: So you are setting up a complete record of the resolution of the concerns, written documentation. So that's available for us to sample and audit.

MR. MYERS: For example, there was Mr. Key's comment on the NSRS review of QTC. I gathered that that was not sent to the NRC. Mr. Key wrote a letter to Mr. Willis, in like November 7th, saying he disagreed with the NSRS review of the -- Mr. Claude Key, used to work at NSRS.

MR. COTTLE: He wrote a memorandum to Bill Willis disagreeing with NSRS response to the QTC report which he had never seen and freely admitted that.

MR. MYERS: He said there were incorrect statements in it. I don't know how he could have decided that there were incorrect stat ents, maybe he hadn't seen it -- did he want to withdraw the letter?

MR. COTTLE: He had not seen the report.

MR. MYERS: What was the basis of his writing the letter?

MR. COTTLE: He had seen the NSRS report and was referring -- rightly or wrongly --

MR. DENTON: The question is has it been sent to NRC?

MR. MYERS: Since it's quite public, NRC was

asking me for this two days ago; it was one of B.D. Liaw's deputies. B.D. Liaw allegedly is in charge of welding, B.D. Liaw is allegedly in charge of looking at the carbo sink problem. Since everybody made sure that he got the report that said that QTC was wrong in its assessment of carbo sink that someone would be sure that B.D. Liaw got Mr. Key's letter that disagreed; no

MR. DENTON: I think our intent, Hugh, was anything relating to the resolution of those allegations within TTVA comes to our attention because unless it comes in the front door there's no assurance it gets to the right parties.

MR. PARRIS: And you are the front door plus that normal distribution list.

MR. THOMPSON: There's three front doors, region 10 -- 2, Jim Taylor, and --

MR. COTTLE: It was my fault I guess because I sent it to the region, inappropriately. I should have giver him one.

MR. WALKER: What surprised me is I heard about it from headquarters.

MR. MYERS: You had to ask for the letter? That's an important point here. I believe that letter was the subject of a major article in the Knoxville Journal. So it was something that people -- seemed to be of interest

and I would have thought that it would have been sent directly to you and Roger you would not have had to ask for it.

MR. DENTON: I take it there's no disagreement, your standing orders to your Staff are send us all things written by anybody in TVA or your contractors that pertain to these allegations.

MR. PARRIS: No disagreement. Whatever crops up, comes up, boils up; whatever.

MR. DENTON: That's the only way to make sure it's recognized and considered. Any other items, then?

If not I think this has been a productive meeting and we'll be meeting again on specific topics.

(Whereupon, at 5:30 p.m., the meeting was concluded.)

CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceedings before the UNITED STATES NUCLEAR REGULATORY COMMISSION in the matter of:

NAME OF PROCEEDING: MEETING BETWEEN NUCLEAR REGULATORY COMMISSION AND TENNESSEE VALLEY AUTHORITY

TVA50.54F PRESENTATION

DOCKET NO.:

PLACE: BETHESDA, MARYLAND

DATE: THURSDAY, DECEMBER 12, 1985

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission.

(sigt) Joel Breitner

(TYPED)
JOEL BREITNER

Official Reporter
ACE-FEDERAL REPORTERS, INC.
Reporter's Affiliation

Nuclear Regulatory Commission
Tennessee Valley Authority

Meeting - December 12, 1985

P11B Phillips Building
1-3:30 p.m.EST
Bethesda, Maryland

AGENDA

1:00 - 1:10	Introduction	H. G. Parris Manager of Power and Engineering (Nuclear)
1:10 - 1:30	TVA Nuclear Performance Plan - Volume 1	C. C. Mason Deputy Manager, P&E Nuclear
1:30 - 1:50	TVA Employee Concern Program	R. P. Denise Assistant to the Deputy Manager, P&E Nuclear
1:50 - 2:00	Sequoyah Employee Concern Program	H. L. Abercrombie Sequoyah Site Director
2:00 - 2:45	Sequoyah Nuclear Performance Plan Volume 2	Mr. Abercrombie
	Environmental Qualification of Equipment Program, SNP	Mr. Abercrombie
	Operational Readiness, SNP	Mr. Abercrombie
	Design Control Survey at Sequoyah	R. W. Cantrell Manager of Engineering
2:45 - 3:30	General Discussion	TVA/NRC
3:30	Adjournment	

H. G. PARRIS PRESENTATION
NRC STAFF BRIEFING
BETHESDA, MARYLAND
DECEMBER 12, 1985

I'm Hugh Parris, Manager of Power and Engineering (Nuclear) for TVA. I am glad to have this opportunity to get back together again to discuss the progress being made at TVA.

My last opportunity to speak before this group was on September 6 when I discussed with you the status of our nuclear program, its problems, and the road we intended to take toward resolution of those issues.

Since that time we have prepared and shared with you a document entitled NUCLEAR PERFORMANCE PLAN. Volume 1 contained our Corporate Plan while Volume 2 addressed Sequoyah Nuclear Plant matters. These two volumes were submitted on November 1. Then, on November 20, we delivered to you a

document describing our new long-term Employee Concerns Program. All three of these documents detail the many individual actions that we are taking to permit TVA to achieve its goals.

We are here today to discuss with you the progress being made.

The agenda for today includes a short statement of our fundamental changes, a review of detailed progress on a number of items for Volume 1 of the Performance Plan, and a review of the Employee Concerns Program.

During the second hour, we would like to focus on Volume 2 of the plan and provide you with additional details as to the current status of the Operational Readiness Review, Environmental Qualification, Design Control and other projects at Sequoyah.

Substantial progress has been and is being made at TVA, both from a technical as well as a management point of view. We have made some fundamental changes in how we conduct our business. These changes are beginning to result in improvements and accomplishments in several areas.

1. One of the key and fundamental changes has been the increased level of involvement of the TVA Board in the nuclear power program. The Board is currently involved on a daily basis with the corporate level activities of the nuclear program.

   While the TVA Board has always been involved with the nuclear program, this involvement has become more intense and at greater depth than ever before. This personal, daily involvement on the part of individual Board members is a very positive force in reshaping our program.

Additional details as to Board involvement will be supplied later in the presentation.

2. A second fundamental change has been the creation of the position of Senior Nuclear Advisor. This Advisor will maintain an overview of TVA's nuclear program activities and performance in order to provide independent assessments and advise the TVA Board on nuclear program matters.

Initially, the Advisor will review our entire nuclear program and provide the results of that review and recommendations to the TVA Board.

As I am sure you are aware from the trade press, we are actively seeking candidates for this position. You have undoubtedly seen specific names mentioned but we are still involved with the selection process and intend to have the

selection made by the end of this month.

3. Another senior-level position being created which will report directly to the TVA Board is that of Inspector General. The Inspector General will be independent from all existing TVA offices.

The Inspector General will also concentrate on TVA's efforts to prevent and detect waste, fraud and abuse, and will have provisions for receiving and dealing with employee concerns.

4. Another fundamental change we have made is the restructuring of the Employee Concerns Program to improve its long-term effectiveness within TVA's nuclear organization.

Our restructured program is designed to reduce employee

concern through positive and effective management involvement directly with people on the front-end.

It will also provide for efficient and timely resolution of concerns once they are voiced.

The Employee Concerns Program will be discussed in greater detail later in the presentation.

5. Another fundamental change we've made is one I described in general at the September 6 meeting here with you. This change brings under a single manager with a single focus the construction, engineering, operation and support organizations.

This organizational concept has been a topic of discussion for some time. Regional management, and probably some of you here in Bethesda, have been strong advocates of this

concept for TVA.

The establishment of this organizational structure and focus was TVA's way of attacking the root cause of one of our major problem areas -- eliminating the large and cumbersome ways of doing business.

I am reporting to you today it is essentially in place and functioning well.

6. Another basic change that has been made is the development of a Senior Management Team for P&E Nuclear. This team is responsible for the day-to-day corporate level policy decisions necessary to provide direction and leadership in the overall effort.

The Team includes the key managers from the operational, technical and support groups and provides the

communications and interfaces required to keep our long-range goals in focus while we work together on our short-term objectives.

The increased level of Board involvement, the addition of a Senior Nuclear Advisor and an Inspector General, the establishment of a nuclear corporate organization and the establishment of a Senior Management Team are providing us with an up-front, long-range management organization whose focus is on long-term performance and reliability.

These fundamental changes are designed to achieve the performance improvements needed at the corporate level. Now that they are being implemented, we are proceeding with the implementation of the many individual action plans.

Now, to discuss some of the details of the changes I've just mentioned along with other accomplishments to date, I would

like to call on Chuck Mason, our Deputy Manager of P&E Nuclear.

For those of you not familiar with Chuck's background, he joined TVA from the Nuclear Navy program 18 years ago. He rose quickly through the ranks to head first our Watts Bar Nuclear Program as plant manager and later Sequoyah Nuclear Plant as plant manager and later its first site director.

Chuck left TVA in 1984 to become part of the corporate team at Kansas Gas and Electric Company responsible for its Wolf Creek Nuclear Plant. There, he did a fine job of directing the completion of construction, the startup and commercial operation of that facility.

Chuck's record speaks for itself. He builds strong and effective teams wherever he goes. He has done so since his early days as a supervisor at TVA and continued to do so as he

rose through the ranks.

His success at Wolf Creek came as no surprise to anyone who has worked with him.

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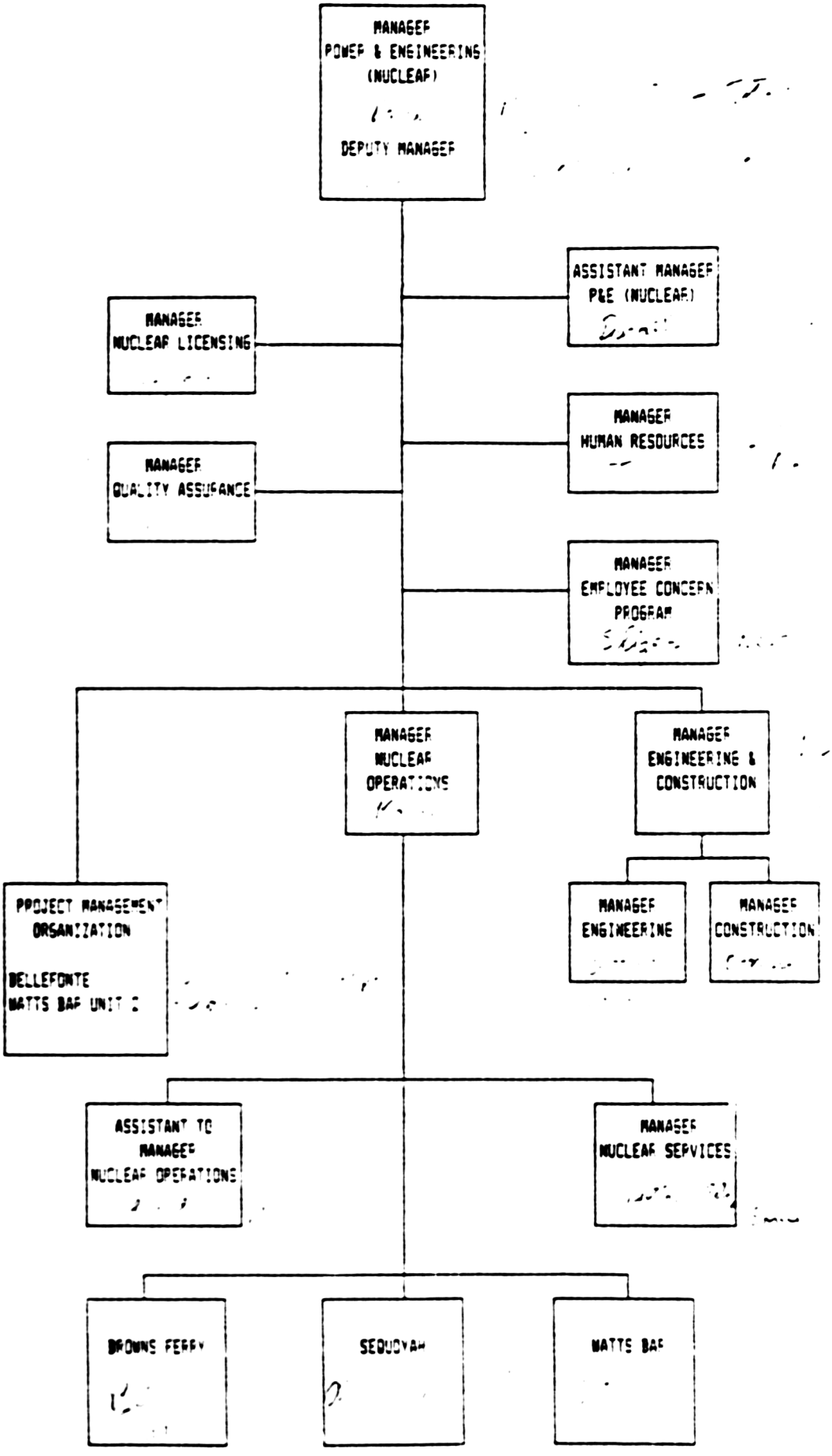

MANAGER
POWER & ENGINEERING
(NUCLEAR)
DEPUTY MANAGER
ASSISTANT MANAGER
P&E (NUCLEAR)
MANAGER
NUCLEAR LICENSING
MANAGER
HUMAN RESOURCES
MANAGER
QUALITY ASSURANCE
MANAGER
EMPLOYEE CONCERN
PROGRAM
MANAGER
NUCLEAR
OPERATIONS
MANAGER
ENGINEERING &
CONSTRUCTION
PROJECT MANAGEMENT
ORGANIZATION
BELLEFONTE
WATTS BAR UNIT 2
MANAGER
ENGINEERING
MANAGER
CONSTRUCTION
ASSISTANT TO
MANAGER
NUCLEAR OPERATIONS
MANAGER
NUCLEAR SERVICES
BROWNS FERRY
SEQUOYAH
WATTS BAR

EMPLOYEE CONCERNS

RICHARD P DENISE

DECEMBER 12, 1985

AGENDA

1. INTRODUCTION

2. STATUS OF P&E (NUCLEAR) EMPLOYEE CONCERN PROGRAM IMPLEMENTATION

3. PROCESS FOR REVIEW AND EVALUATION OF EMPLOYEE CONCERNS

4. STATUS OF CONCERNS FROM THE WATTS BAR SPECIAL EMPLOYEE CONCERN PROGRAM

5 STATUS OF REVIEW OF "K-FORMS" FOR GENERIC APPLICABILITY TO SEQUOYAH

POWER AND ENGINEERING (NUCLEAR) EMPLOYEE CONCERN PROGRAM SCHEDULE FOR IMPLEMENTATION

— Reports to Mgr. P&E (Nuclear)

PROGRAM MANAGER SELECTION (Eric Singer)	DEC 1, 1985
SITE REPRESENTATIVE SELECTIONS	BY JAN 1, 1986
EMPLOYEE TRAINING / SITE REPRESENTATIVE TRAINING	JAN 1 - FEB 1, 1986
PROGRAM IMPLEMENTATION	FEB 1, 1986

SAFETY RELATED
EMPLOYEE CONCERN
REVIEW AND EVALUATION

'K-FORMS'

- GENERIC APPLICABILITY
- STOPWORK
- PRELIMINARY REPORTABILITY
- PRIORITY INVESTIGATION

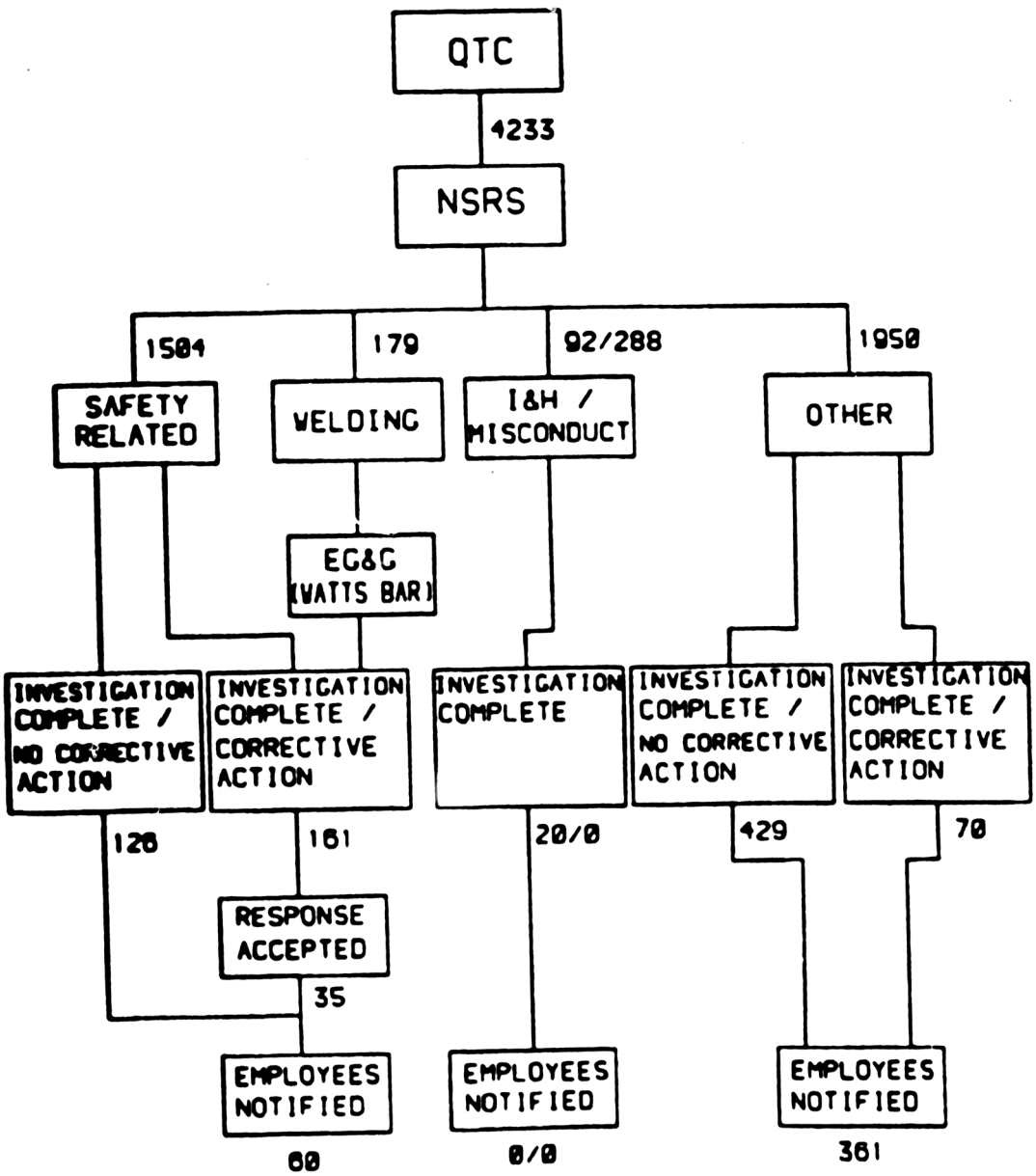
INVESTIGATION REPORTS

- INVESTIGATION REPORT ADEQUACY
- GENERIC APPLICABILITY
- STOPWORK
- REPORTABILITY

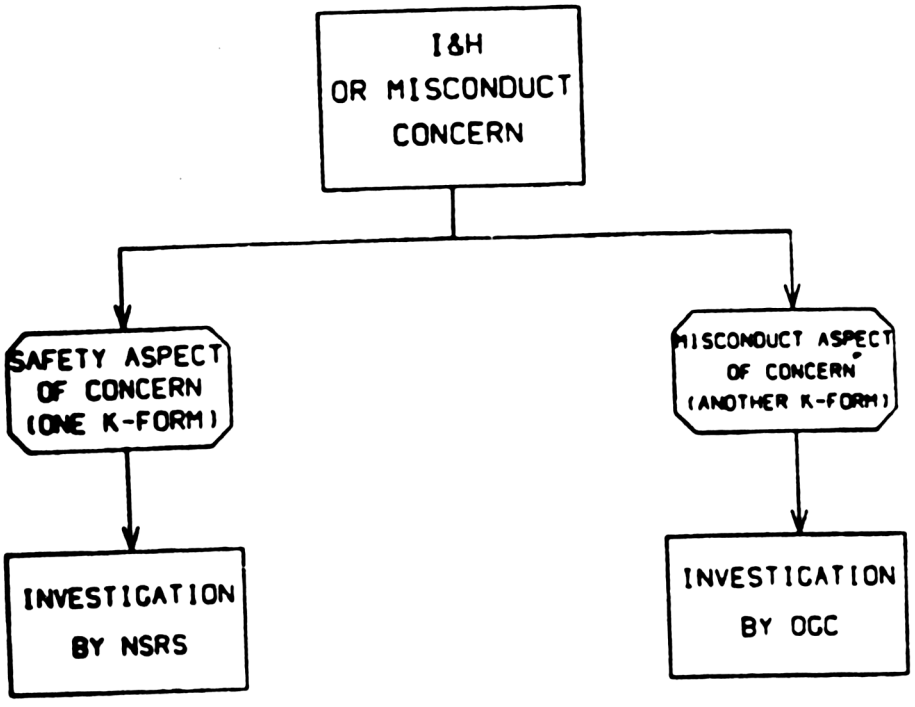
INVESTIGATION REPORT RESPONSE

- RESPONSE ADEQUACY
- GENERIC APPLICABILITY
- STOPWORK
- REPORTABILITY

STATUS OF EMPLOYEE CONCERNS
DECEMBER 7, 1985

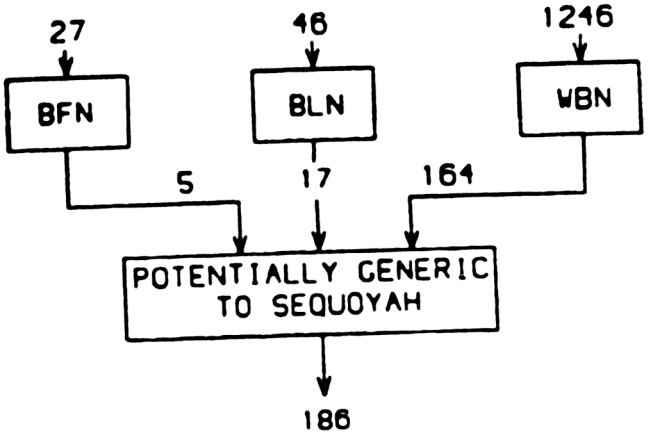


INVESTIGATION OF INTIMIDATION AND HARASSMENT AND MISCONDUCT CONCERNS



- K-FORMS FOR NUCLEAR SAFETY RELATED CONCERNS ARE IDENTIFIED AND INVESTIGATED INDEPENDENT OF THE MISCONDUCT ISSUE
- NSRS AND OGC UTILIZE QTC TO PERFORM SELECTED SAFETY RELATED, I&H, AND MISCONDUCT INVESTIGATIONS

SAFETY RELATED "K-FORM" GENERIC APPLICABILITY REVIEW



GENERIC ISSUES	NO OF CONCERNS
ENVIRONMENTAL QUALIFICATION	1
OPERATIONAL READINESS	45
CABLE TRAY & CONDUIT HANGERS	4
PIPE HANGERS & ANCHOR BOLTS	18
CABLES	40
CONFIGURATION CONTROL	13
WELDING	31
MISCELLANEOUS	34

TVA EMPLOYEE CONCERN EVALUATION

FOR SEQUOYAH STARTUP

I. RECEIPT OF "K-FORMS"

II. PRELIMINARY EVALUATION

- A PERFORMED BY OFF-SHIFT STAs
- B TECHNICAL SPECIFICATION LCO PROBLEM
- C POTENTIAL UNREVIEWED SAFETY QUESTION

III. INDEPENDENT EVALUATION BY NSRS

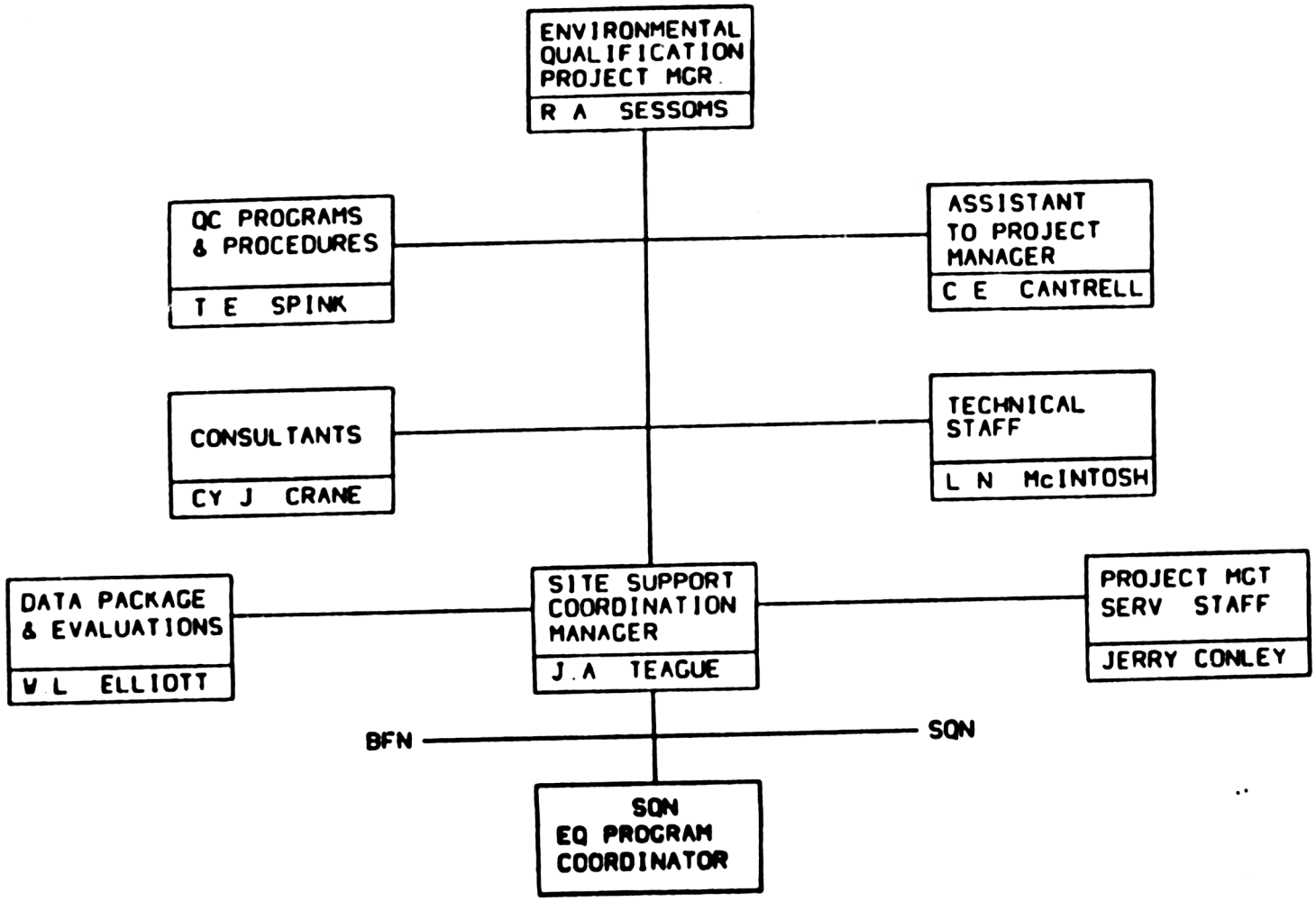
IV JOINT LIST PRIORITIZING EMPLOYEE CONCERNS

V LIST OF CORRECTIVE ACTIONS TO BE ACCOMPLISHED PRIOR TO STARTUP

GENERIC EMPLOYEE CONCERN EVALUATIONS

PLANT	NUMBER OF GENERIC "K-FORMS"
WATTS BAR	164
BROWNS FERRY	5
BELLEFONTE	17
TOTAL	186

CATEGORY	NUMBER OF GENERIC "K-FORMS"
ENVIRONMENTAL QUALIFICATION	1
OPERATIONAL READINESS	45
CABLE TRAY AND CONDUIT HANGERS	4
PIPE HANGERS AND ANCHOR BOLTS	18
CABLES	40
CONFIGURATION CONTROL	13
WELDING	31
MISCELLANEOUS	34
TOTAL	186



ENVIRONMENTAL QUALIFICATION PROJECT ORGANIZATION

SAFETY SIGNIFICANT CRITERIA

SAFETY SIGNIFICANT CRITERIA ARE THOSE CRITERIA USED TO ANALYZE A POTENTIAL SAFETY-RELATED CONCERN THAT IF SUBSTANTIATED COULD AFFECT THE ABILITY OF A SAFETY SYSTEM TO PERFORM ITS SAFETY-RELATED FUNCTION REQUIRED FOR THE PREVENTION OR MITIGATION OF ACCIDENTS WHICH COULD RESULT IN POTENTIAL OFFSITE EXPOSURES EXCEEDING THOSE SPECIFIED IN THE TECHNICAL SPECIFICATIONS OR 10 CFR 100

IF THE ANSWER TO ANY OF THE ABOVE QUESTIONS IS "YES", A SAFETY SIGNIFICANT QUESTION OR SAFETY HAZARD MAY BE INVOLVED. A PRIORITIZED INVESTIGATION MUST BE MADE BEFORE A IDENTIFIED PLANT OPERATIONAL MODE MILESTONE ASSOCIATED WITH THE CONCERN IS ACHIEVED IF THE OPERATIONAL MILESTONE HAS BEEN ACHIEVED, THE PLANT MUST BE IMMEDIATELY INFORMED TO PERFORM AN UNREVIEWED SAFETY QUESTION DETERMINATION

ENVIRONMENTAL QUALIFICATION PROJECT

AUGUST 21 - SEQUOYAH SITE DIRECTOR DESIGNATED RESPONSIBLE FOR RESOLUTION OF ENVIRONMENTAL QUALIFICATION CONCERNS

AUGUST 22 - PROJECT MANAGER AND SKELETON PROJECT ORGANIZATION ESTABLISHED MEETING IN KNOXVILLE WITH ENGINEERING PERSONNEL ESTABLISHED ORGANIZATION RESPONSIBILITIES PROJECT OBJECTIVE ESTABLISHED

AUGUST 23, 24, 25 - PROJECT MANAGER ESTABLISHED PROJECT IMPLEMENTATION PLAN, IDENTIFIED RESOURCES REQUIRED, AND ESTABLISHED METHODOLOGY FOR ASSEMBLING OF EQ PACKAGE

AUGUST 26, 27 - PROCEDURES AND CHECKLISTS DEVELOPED FOR EQ PACKAGES TRAINING MODULE PREPARED RESOURCES ASSIGNED TO PROJECT

AUGUST 28 - TRAINING PROCEDURES AND CHECKLIST

ENVIRONMENTAL QUALIFICATION PROJECT MANAGER'S OBJECTIVES

1. CONSOLIDATE PERTINENT INFORMATION INTO A QUALIFICATION FILE THAT WILL FULFILL ALL REQUIREMENTS OF 10 CFR 50 49 REGARDING PROOF OF ENVIRONMENTAL QUALIFICATION

2 ENSURE ALL REQUIREMENTS OF 10 CFR 50 49 REGARDING THE EQUIPMENT QUALIFICATION PROGRAM ARE AVAILABLE, ADEQUATE, AND PROPERLY ENTERED INTO A DOCUMENT SYSTEM THAT ADDRESSES ALL REQUIREMENTS OF THE RULE

3 PRIORITY FOR THIS PROJECT IS ON SEQUOYAH GENERIC INFORMATION FOR ALL PLANTS CAN BE ADDRESSED IF IT DOES NOT SIGNIFICANTLY IMPACT THE SEQUOYAH EFFORT

4. WATTS BAR AND BROWNS FERRY ARE TO BE ADDRESSED CONSISTENT WITH THEIR ANTICIPATED STARTUP DATES

UNIT 2
SCHEDULE FOR COMPLETION
OF 10 CFR 50 49 IMPLEMENTATION

JANUARY 21, 1986 - COMPLETE REROUTING OF CABLE INSIDE CONTAINMENT TO RESOLVE CABLE SUBMERGENCE PROBLEMS

JANUARY 21, 1986 - RESOLVE ROCKBESTOS CABLE TEST REPORTS (1)

JANUARY 13, 1986 - COMPLETE REPULL OF CABLE WITH EXPIRED LIFE

JANUARY 6, 1986 - COMPLETE ISSUANCE OF ALL EQ BINDERS THAT ARE COMPLETE OR COMPLETE WITH FIELD WORK OUTSTANDING

JANUARY 6, 1986 - RESOLVE OPEN ISSUES THAT COULD IMPACT QUALIFICATON OF EQUIPMENT (28 CABLE BINDERS TOTAL)

1 MAIN STEAM VAULT SUBMERGENCE (14)

2 IDENTIFY ANY CABLE FROM THE CABLE LOAD STUDY THAT HAVE REDUCED LIFE (17)

3 COMPLETE TESTING AT WYLIE LABORATORY OF SELECTED CABLE (12)

JANUARY 6, 1986 - COMPLETE IMPLEMENTATION OF QUALIFIED MAINTENANCE DATA SHEETS

1 REPLACE NYLON ROLLERS ON NAMCO LIMIT SWITCHES

2 VERIFY INSTALLATION IN ACCORDANCE WITH QUALIFICATION MAINTENANCE DATA SHEETS

DECEMBER 30, 1985 - COMPLETE REWIRING OF MOTOR OPERATED VALVES

MOVATS TESTING CONTINUES TO 1/12/86

DECEMBER 23, 1985 - ALL PROCEDURES IMPLEMENTED FOR LIFE OF PLANT ENVIRONMENTAL QUALIFICATION PROGRAM

DECEMBER 23, 1985 - COMPLETE TRAINING OF SELECTED MANAGERS, ENGINEERS, AND CRAFTS FOR LIFE OF PLANT ENVIRONMENTAL QUALIFICATION

DECEMBER 16, 1985 - BEGIN ISSUANCE OF EQ BINDERS

DECEMBER 16, 1985 - ISSUE LIST OF EQUIPMENT UNDER 10 CFR 50 49 PROGRAM

SEQUOYAH STARTUP READINESS REVIEW

RESPONSE TO ITEM 3- "OPERATIONAL READINESS PLAN"

METHODOLOGY

1. TWO MID-LEVEL MANAGERS ASSIGNED FULL TIME TO COORDINATE THE REVIEW

2. EACH PLANT SUPERVISOR WAS PROVIDED PACKAGES DETAILING DEVIATIONS CHARGED TO HIS ORGANIZATION DURING SALP PERIOD THESE PACKAGES INCLUDED

   - NRC VIOLATIONS
   - LERs
   - SCRAM REPORTS
   - SECURITY DEGRADATIONS
   - QA AUDIT FINDINGS
   - INPO RECOMMENDATIONS
   - CORRECTIVE ACTION REPORTS
   - HEALTH PHYSICS VIOLATONS

3. SUPERVISORS EVALUATED THIS INFORMATION TO ANSWER THE FOLLOWING QUESTIONS

   - WAS THE ROOT CAUSE CORRECTLY IDENTIFIED?
   - WAS APPROPRIATE CORRECTIVE ACTION IMPLEMENTED?
   - WAS CORRECTIVE ACTION EFFECTIVE TO PREVENT RECURRENCE?
   - ARE THERE UNFAVORABLE TRENDS NOT PREVIOUSLY IDENTIFIED?

4. THE COORDINATORS MET WITH SUPERVISORS TO DISCUSS THEIR FINDINGS ACTIONS COMPLETED OR PLANNED TO CORRECT OR IMPROVE PERFORMANCE WERE RECORDED

5. A MATRIX WAS PREPARED TO ASSURE THAT THESE ACTIONS ADDRESSED ALL NRC CONCERNS THIS INFORMATION WAS THEN ORGANIZED INTO THIS STARTUP READINESS REPORT

SEQUOYAH STARTUP READINESS REPORT

RESPONSE TO ITEM 3 - "OPERATONAL READINESS PLAN"

CONTENTS

SEQUOYAH STARTUP READINESS REVIEW

RESPONSE TO ITEM 3 - "OPERATIONAL READINESS REVIEW"

DETAILED LISTING OF SUBJECTS ADDRESSED

EXECUTIVE SUMMARY

1.0 SEQUOYAH MANAGEMENT GOALS AND OBJECTIVES
- ACCOUNTABILITY
- PROCEDURAL AND MANAGEMENT CONTROLS
- EMPLOYEE STAFFING, TRAINING, QUALIFICATION

2.0 STRENGTHENING THE MANAGEMENT STRUCTURE
- BACKGROUND
- IMPLEMENTATION OF SITE DIRECTOR ORGANIZATION
- OPERATION EXPERIENCE
- SPECIFIC ORGANIZATIONAL AND MANAGEMENT CHANGES (DESIGN, MODIFICATIONS, OPERATIONS, MAINTENANCE, QA, ENGINEERING)

3.0 MANAGEMENT CONTROL / QUALITY ASSURANCE
- STATEMENT OF GOALS AND OBJECTIVES
- COMMUNICATION OF MANAGEMENT EXPECTATIONS TO EMPLOYEES
- PERFORMANCE MONITORING
- CORRECTIVE ACTION

4 0 MANAGEMENT INVOLVEMENT TO IMPROVE REGULATORY PERFORMANCE AND TO ACHIEVE EXCELLENCE IN OPERATIONS

- PLANT OPERATIONS
- SCRAM REDUCTIONS
- ESF ACTUATIONS
- SHIFT TECHNICAL ADVISORS
- REVIEW OF DAVIS-BESSE OPERATING EXPERIENCE
- SURVEILLANCE TESTING ACTIVITIES
- CHEMISTRY LABORATORY OPERATIONS
- RADIOLOCICAL HEALTH
- PLANT SECURITY
- DESIGN SUPPORT
- MODIFICATION PROGRAM
- POST MODIFICATION TESTING
- TRAINING
- PLANNING AND SCHEDULING
- FIRE PROTECTION
- NUCLEAR OPERATING EXPERIENCE REVIEW
- REPORTING
- IMPROVEMENTS TO FACILITIES
- VIBRATION DIAGNOSTICS

5.0 EMERGENCY PREPAREDNESS

-ASSESSMENT OF RADIOLOGICAL EMERGENCY PREPAREDNESS
-SUMMARY OF SEQUOYAH REP PROGRAM ENHANCEMENTS

6.0 PLANT MAINTENANCE

-IMPROVEMENTS IN MAINTENANCE ORGANIZATION AND STAFFING
-MAINTENANCE ACCOUNTABILITY AND MANAGEMENT INVOLVEMENT
-MAINTENANCE INSTRUCTION ENHANCEMENT
-ACTIONS TO SYSTEMATICALLY CHANGE PLANT MAINTENANCE EMPHASIS FROM SHORT-TERM PLANNING AND RESPONSE TO PROBLEMS, TO LONG-TERM PLANNING AND PREVENTIVE MAINTENANCE
-MAINTENANCE TRAINING

ATTACHMENTS

INDUSTRY REVIEW TEAM

TEAM CONSISTED OF;

- TVA SENIOR MANAGER
- ANI REPRESENTATIVE
- TWO MANAGERS FROM DUKE POWER, ONE WITH MAINTENANCE EXPERIENCE, AND ONE WITH OPERATIONS EXPERIENCE
- INPO REPRESENTATIVE

THE TEAM HAD TWO RECOMMENDATIONS TO BE COMPLETED PRIOR TO STARTUP:

1. TRAIN SHIFT TECHNICAL ADVISORS ON THE SAFETY PARAMETER DISPLAY SYSTEM TO ALLOW THEM TO OPERATE THE SYSTEM FOR THE TECHNICAL SUPPORT CENTER PERSONNEL

2. REVIEW OUTSTANDING PRE-OPERATIONAL TEST OPEN ITEMS AND DETERMINE THAT THEIR STATUS DOES NOT CONSTITUTE AN UNREVIEWED SAFETY QUESTION

SEQUOYAH NUCLEAR PERFORMANCE PLAN
COMMITMENTS

COMMITMENT	COMPLETION DATE
1. TVA WILL SUBMIT TO THE NRC A COPY OF THE FINAL DESIGN CONTROL SURVEY BY GILBERT COMMWEALTH AND OUR COMMENTS (PART V)	11/07/85 COMPLETE
2. AN INSTRUCTION REVIEW SHEET WILL BE IMPLEMENTED ON AN INTERIM BASIS TO OBTAIN INPUT FROM CRAFTSMEN TO ENSURE ADEQUACY OF THE EXISTING MAINTENANCE INSTRUCTION THE REVIEW SHEET WILL BE IMPLEMENTED BY NOVEMBER 15, 1985. (6.4.3)	11/15/85 COMPLETE
3. IN RESPONSE TO NRC INSPECTON REPORT 50-327, -328/84-38, IMPROVEMENTS TO THE FUNCTIONAL TEST PROGRAM WILL INCLUDE REVISION OF APPLICABLE PLANT PROCEDURES TO ENSURE FUNCTIONAL TESTS ARE REQUIRED FOR TEMPORARY ALTERATIONS WHICH MAY BECOME PERMANENT, BASIC INSTRUCTIONS ARE INCLUDED IN FUNCTONAL TEST PROCEDURES, AND A METHOD FOR IDENTIFYING AND CORRECTING FUNCTIONAL TEST DEFICIENCIES (4.12)	12/03/85 COMPLETE
4. PROVIDE A SENIOR REACTOR OPERATOR (SRO) TO WORK WITH THE QUALITY ASSURANCE (QA) GROUP AND MAINTENANCE PLANNERS TO PROVIDE OPERATIONS KNOWLEDGE AND EXPERIENCE (2.4.4 AND 2.4.5)	AS AVAILABLE
5. FOR FISCAL YEAR 1986, WHERE POSSIBLE, PLANT GOALS WILL BE SPECIFIED BY MAJOR PLANT ORGANIZATIONAL UNITS (3.1.2)	———
6. THE TIERING OF PROCEDURES IS BEING REDUCED WHERE POSSIBLE AS PRACTICAL, PLANT PROCEDURES WILL DIRECTLY IMPLEMENT REGULATORY DOCUMENTS WITHOUT INTERMEDIATE LEVEL MANUALS (3.2.3)	———
7. IN RESPONSE TO NRC VIOLATIONS 50-327, -328/85-28-02, AN EMPLOYEE HANDBOOK HAS BEEN PREPARED AND WILL BE DISTRIBUTED. THIS HANDBOOK EXPLAINS EMPLOYEE'S RESPONSIBILITIES WITH REGARD TO RADIOLOGICAL HEALTH (E.G., PROPER WEARING OF DOSIMETRY), SECURITY (E.G., PLANT ENTRY AND BADGING REQUIREMENTS), AND EMERGENCY RESPONSE (E.G., ASSEMBLY LOCATIONS). (3.2.3)	12/31/85

SEQUOYAH NUCLEAR PERFORMANCE PLAN
COMMITMENTS

COMMITMENT	COMPLETION DATE
8 IN RESPONSE TO NRC VIOLATON 50-327, -328/84-31-04 PRIOR TO UNIT 1 STARTUP, THE FIRE PROTECTION STRAINERS WILL BE CLEANED AND A MAINTENANCE INSTRUCTION WILL BE IN PLACE WHICH ADDRESSES FUTURE PERIODIC INSPECTION AND CLEANING. (4 15.3)	PRIOR TO UNIT 1 STARTUP
9 PAST VIOLATION RESPONSES, BULLETIN RESPONSES, LICENSEE EVENT REPORTS, AND NUREG-0737 ITEMS WILL BE REVIEWED BACK TO JANUARY 1, 1981 BEFORE RESTART COMMITMENTS IDENTIFIED WHICH ARE FOUND TO BE PAST DUE WILL EITHER BE COMPLETED OR HAVE NEW DATES ESTABLISHED (4 17 4)	PRIOR TO STARTUP
10 PRIOR TO RESTART OF EITHER UNIT, ALL SAFETY-RELATED EMPLOYEE CONCERNS WILL BE REVIEWED FOR SAFETY SIGNIFICANCE THOSE THAT ARE SIGNIFICANT WILL BE INVESTIGATED, AND THE RESULTS OF THE INVESTIGATION REVIEWED FOR CORRECTIVE ACTON. (4.2.2)	PRIOR TO STARTUP
11 A CHECKLIST FOR REVIEW OF MAINTENANCE INSTRUCTIONS WILL BE DEVELOPED (6 4 2)	01/86
12. UTILIZING THE ABOVE CHECKLIST, A REVIEW FOR ENHANCEMENT OF EXISTING MAINTENANCE INSTRUCTIONS WILL BE COMPLETED BY JULY 1987 (6.4)	07/01/87
13. GUIDELINES WILL BE DEVELOPED FOR MAINTENANCE PLANNERS TO:	
a. DETERMINE WHEN A POST-MAINTENANCE TEST INSTRUCTION IS NEEDED. GUIDELINES WILL BE PREPARED BY JANUARY 1, 1986.	01/01/86
b. DETERMINE WHEN AN MR PACKAGE IS POTENTIALLY INADEQUATE FOR THE PLANNED WORK AND TO DIRECT THE PLANNERS TO AN EXISTING INSTRUCTION OR REQUIRE EVALUATION FOR PREPARATION OF A NEW INSTRUCTION. (6.4.7)	PRIOR TO STARTUP

SEQUOYAH NUCLEAR PERFORMANCE PLAN
COMMITMENTS

	COMMITMENT	COMPLETION DATE
14	A BASIC COMPUTERIZED TRENDING PROGRAM, UTILIZING NPRDS DATA BASE, WILL BE ESTABLISHED USING INPO GUIDELINES (6 5 3)	12/31/85
15	PRIOR TO STARTUP, AVAILABILITY AND OPERABILITY OF SAFETY-RELATED EQUIPMENT WILL BE VERIFIED BY THE FOLLOWING (6 7 2)	
	a REVIEW OF OUTSTANDING MAINTENANCE REQUESTS TO ENSURE THAT NO UNWORKED ITEM WILL DEGRADE EQUIPMENT OR IMPEDE OPERATOR ACTION NECESSARY FOR SAFE OPERATION OF THE PLANT	PRIOR TO STARTUP
	b REVIEW OF POTENTIAL REPORTABLE OCCURRENCES INITIATED FOR EQUIPMENT FAILURES WHICH OCCURRED SINCE MARCH 1984 TO DETERMINE ADEQUACY OF CORRECTIVE MAINTENANCE TO PREVENT RECURRENCES	PRIOR TO STARTUP
	c REVIEW OF SURVEILLANCE TESTS AND PREVENTATIVE MAINTENANCE SCHEDULES TO ENSURE PERFORMANCE OF REQUIRED TESTING AND NEEDED MAINTENANCE	PRIOR TO STARTUP
16	PRIOR TO STARTUP OF UNIT 2, A REVIEW WILL BE MADE TO ENSURE PROPER METHODS WERE USED FOR DETERMINATION OF SEISMIC LOADS FOR CONDUIT, DUCT, AND PIPE SUPPORTS IN THE DIESEL GENERATOR BUILDING	
17	TO ADDRESS THE LIMITORQUE VALVE OPERATOR GEAR REVERSAL PROBLEM IDENTIFIED AT BROWNS FERRY VALVES 1 & 2-FCV-74-1 AND 1 & 2-FCV-74-2 WILL BE INSPECTED PRIOR TO STARTUP, AND THE LIMITORQUE MAINTENANCE PROCEDURE WILL BE REVISED PRIOR TO FEBRUARY 1, 1986. (6.1.2)	INSP - COMPLETE PROCED - 2/1/86
18.	SQN WILL SEEK ACCREDIATION OF THE ELECTRICAL AND MECHAICAL MAINTENANCE TRAINING PROGRAMS. A SELF-EVALUATION REPORT WILL BE SUBMITTED BY JANUARY 1986, WITH ACCREDITATION EXPECTED BY THE SPRING OF 1986. (4.13.1)	(a) SELF-EVAL 01/86 (b) SPRING, 1986

SEQUOYAH NUCLEAR PERFORMANCE PLAN
COMMITMENTS

COMMITMENT	COMPLETION DATE
19 PROVIDE DEGREED ENGINEERING EXPERTISE WITHIN THE OPERATIONS GROUP (2 4 3)	06/30/86
20 SQN WILL COMPLETE ALL APPENDIX R WORK (WITH THE EXCEPTION OF THOSE DEVIATIONS AWAITING APPROVAL BY NRC) BY THE JUNE 30, 1986 DATE AS COMMITTED TO IN THE TVA RESPONSE TO NRC AUGUST 10, 1984 CONFIRMATION OF ACTION LETTER. (4 15 1)	06/30/86
21 NEW MAINTENANCE INSTRUCTIONS FOR 17 CRITICAL STRUCTURES SYSTEMS & COMPONENTS EQUIPMENT ITEMS WILL BE PREPARED BY JULY 1986 (6 4 4)	07/25/86
22 A COMPREHENSIVE SAFETY-RELATED MOTOR-OPERATED VALVE (MOV) PROGRAM FOR VISUAL INSPECTON, LUBRICATION, AND TESTING IS BEING DEVELOPED WITH INSTRUCTONS EXPECTED TO BE IN PLACE PRIOR TO START OF THE UNIT 2, CYCLE 3 OUTAGE (6 5 4)	12/86
23 THE QA GROUP WILL IMPLEMENT A FORMALIZED ON-THE-JOB TRAINING PROGRAM FOR QUALITY CONTROL (QC) GROUP INSPECTORS. (2 4 5)	

ENGINEERING DESIGN CONTROL
1975 - 1985

APPROXIMATELY 200 DETAILED PROCEDURES

TECHNICAL GUIDES AND STANDARDS

MINIMUM OF TIERING

ADEQUATE BUT NOT USER FRIENDLY

USED ONLY FOR QA WORK

ENGINEERING PROGRAM DIRECTIVES
1985

MANAGEMENT POLICY AND PHILOSOPHY

ORGANIZATION AND RESPONSIBILITIES

DESIGN PROCESS

EIGHTEEN ENGINEERING PROCEDURES

PROJECT MANUAL REQUIRED

GILBERT COMMONWEALTH REVIEW OF PRESENT DESIGN CONTROL PROCESS

SEQUOYAH

THREE EXCEPTIONS

THREE ENHANCEMENTS

EXCEPTIONS

SYSTEMATIC SOURCE OF PLANT CONFIGURATION INFORMATION TO DESIGNER

ACCEPTANCE CRITERIA FOR ADEQUATE DOCUMENTATION OF DESIGN BASIS

USQD SHOULD BE LIVING DOCUMENT AND UPDATED UPON DESIGN COMPLETION, PARTIAL IMPLEMENTATION, AND FCR

ENHANCEMENTS

CONTROL OF INTERFACES BETWEEN OE CENTRAL STAFF AND OE SITE ORGANIZATIONS

INTEGRATION OF OE PERSONNEL INTO SITE ORGANIZATION

ENHANCE THE DESIGN VERIFICATON PROGRAM WITH SENIOR TECHNICAL REVIEWS