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6	SUBCOMMITTEE ON PLANT OPERATIONS AND FIRE PROTECTION
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8	MEETING
9	+ + + + +
10	TUESDAY,
11	March 31, 2009
12	+ + + + +
13	ROCKVILLE, MD
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16	The Subcommittee convened in Room T2B3 in
17	the Headquarters of the Nuclear Regulatory
18	Commission, Two White Flint North, 11545 Rockville
19	Pike, Rockville, Maryland at 8:30 a.m., Mr. Harold
20	Ray, Chair, presiding.
21	
22	SUBCOMMITTEE MEMBERS PRESENT:
23	HAROLD RAY, Chair
24	JOHN D. SIEBER
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1	MARIO V. BONACA	
2	SAID ABDEL-KHALIK	
3	OTTO L. MAYNARD	
4	CHARLES H. BROWN, JR.	
5		
6	NRC STAFF PRESENT:	
7	MAITRI BANERJEE, Designated Federal Official	
8	JOSEPH GIITTER	
9	PAT MILANO	
10	L. RAGHAVAN	
11	BOB HAAG	
12		
13	ALSO PRESENT:	
14	GEORGE MORRIS (via telephone)	
15	MASOUD BAJESTANI	
16	GORDON ARENT	
17	STEVEN HILMES	
18	WILLIAM CROUCH	
19	FRANK KOONTZ	
20	P. DAVID OSBORNE	
21	EDWIN FREEMAN	
22	STEVE SMITH	
23	BOB MOLL	
24		
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**REGION PRESENTATION:** 

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P-R-O-C-E-E-D-I-N-G-S 1 2 8:28 a.m. Good morning. 3 CHAIR RAY: I'm Harold 4 Ray, Chairman of the ACRS Plant Operations and Fire 5 Protection Subcommittee for Operating License Review of Watts Bar Nuclear Plant, Unit 2. Other ACRS 6 7 Members in attendance are Jack Sieber, Charlie Brown, 8 Otto Maynard, Mario Bonaca, John Stetkar, Said Abdel-9 Khalik and we may have one other Member participating 10 who has not yet arrived. 11 Ms. Maitri Banerjee is the Designated Official TVA's 12 Federal for this meeting. The original operating license application was for a two-13 14 unit plant, but construction and NRC operating 15 license review of Unit 2 was put on hold after 16 organizational efficiencies were identified with TVA 17 in the mid-1980s and Unit 2 was put in a deferred 18 plant status. staff safety evaluation 19 The NRC for operating license review for Watts Bar Unit 1 and 20 21 Unit 2 documented in NUREG-0847 through was 22 Supplement 20 and resulted in an operating license for Unit 1, but Unit 2 review was incomplete. 23 24 The purpose of today's meeting is to **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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receive a briefing from the staff and TVA and discuss the staff plan for completing the operating license review of Watts Bar Unit 2 and its scope delineated in recently issued Supplement 21 of the NUREG that I referenced.

This briefing is open to the public and if we have members of the public participating, we will have up to 10 minutes for any member of the public who may want to ask questions, to do so at the end of the meeting.

At this point, I would like to ask those on the line, which is open at this point, to identify themselves, please.

MR. MORRIS: George Morris.

15 CHAIR RAY: Mr. Morris. Anyone else? The line will be placed in listen only mode, at this 16 time. As a transcript of the meeting is being kept, 17 18 I request that participants in this meeting use the 19 microphones located throughout the meeting room when they are addressing the Subcommittee. 20 Participants 21 should first identify themselves and speak with 22 sufficient clarity and volume, so that they can be 23 readily heard.

We also have a telephone bridge line, as

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I have just noted, established for the meeting, which is one way only. People on the bridge line will be able to listen in, but not ask questions.

At the end of today's meeting, the 4 5 Subcommittee will caucus relative to whether to 6 recommend to the Full Committee that the ACRS issue a 7 letter at this time. I'll jump ahead to the last 8 slide of the staff's presentation, so that we will 9 all be focused on this at the outset where the staff 10 requests and ACRS letter report at the May 2009 ACRS 11 meeting with ACRS recommendations for the current 12 review starting points.

13 So the issue at hand primarily for the 14 Subcommittee is the starting point for this review 15 that the staff will be describing to us.

We will now proceed with the meeting and I'll call on Mr. Joseph Giitter of the Office of Nuclear Reactor Regulation to begin the staff presentation.

20 MR. GIITTER: Okay. Good morning. Thank 21 you for the opportunity to speak today. My name is 22 Joe Giitter. I'm the Director of the Division of 23 Operating Reactor Licensing in the Office of Nuclear 24 Reactor Regulation. I plan to keep my opening

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remarks brief to stay on the scheduled time this morning.

As you know, the Atomic Energy Commission granted Tennessee Valley Authority or TVA а construction permit for Watts Bar Unit 2 on January 3, 1973. Jumping ahead quite a bit of time, on August 3, 2007, TVA notified the NRR Office Director that TVA would resume construction of Watts Bar Unit 2 within 120 days in accordance with the Commission policy statement on deferred plans.

Today we are here to talk about the process that we are following in terms of licensing and construction inspection that will ensure adequate protection of public health and safety. Over the next several hours, you will hear more about what has transpired at Watts Bar Unit 2 since the mid-80s when construction was stopped.

And since then, you are also going to hear about areas that staff has reviewed today to consider resolved or closed, including areas that the staff considers open. You will also hear about the current licensing basis and refurbishment of plan equipment from TVA and about potential interactions between Unit 2 construction or reactivation and Unit

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11 1 2 completion and the ongoing operation maintenance of Unit 1. 2 3 I was at TVA at the Watts Bar site 4 several months ago and was able to see how that was 5 being addressed. On February 27, 2009, the staff provided 6 7 the ACRS with NUREG-0847, Supplement 21, the safety 8 evaluation report, related to the operation of Watts 9 Bar Unit 2. This provides the NRC staff summary of 10 the previous reviews and is the starting point for 11 the review from this point forward. 12 The NRC staff proposes to come back to ACRS on a periodic basis with supplements to NUREG-13 0847. 14 15 CHAIR RAY: Joe, excuse me. Since you 16 did just now state that the starting point was, could 17 you repeat that one more time? 18 MR. GIITTER: Sure. What we plan to do 19 is to -- the starting point is the Supplement 21, the NUREG-0847, which was the original NUREG. 20 What we 21 would like to do is to come back as we complete 22 additional supplements to NUREG-0847. You will hear more about that from the staff as to what is -- and 23 24 you have had an opportunity hopefully to look at the **NEAL R. GROSS** 

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Supplement 21 to NUREG-0847.

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At the end of the day after hearing 2 3 presentations from the staff, we hope that you will 4 recommend to the ACRS Full Committee to write a 5 letter/report that provides ACRS recommendations 6 regarding the Watts Bar Unit 2 review. 7 At this point, I'll turn it over to Pat 8 Milano, on my left, who is going to talk more about 9 the process that we are following. Pat is the NRR 10 Senior Project Manager for Watts Bar Unit 2. 11 MR. MILANO: Thank you. Good morning, 12 Mr. Ray and other Members of the Subcommittee. 13 CHAIR RAY: Morning. MR. MILANO: Since Watts Bar both Units 1 14 15 and 2 have had a checkered history and a complicated history in terms of plant licensing and stuff, I 16 would like to go through a little bit of background 17 18 information just to set the stage for, you know, future discussions. 19 20 With regard to the plant, you know, some basic design information, in 1971 TVA applied for the 21 22 original construction permits for а two-unit 23 Westinghouse 4-loop pressurized water reactor at its 24 Watts Bar Nuclear Plant site in Rhea County, **NEAL R. GROSS** 

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Tennessee. The site comprises about 1,700 acres on the west bank of the Chicamauga Reservoir, which is on the Tennessee River about 50 miles northeast of Chattanooga, Tennessee.

5 Also, just for some other geographical 6 perspective, the site is about 2 miles south of the 7 Watts Bar Dam and about 1 mile south of a retired TVA 8 fossil-fired station. The nuclear steam supply 9 system for Watts Bar Unit 2 is to be rated at 3411 10 megawatts thermal with an electrical -- an expected 11 electrical output of about 1,200 megawatts of 12 electric.

Unit 1 currently operates at a slightly higher thermal power level of 3459 because the staff has approved a measurement uncertainty uprate for Watts Bar Unit 1 that TVA currently does not plan to request during the initial operating license, but may come in at a later time and request the same thing for Unit 2, after the Unit 2 is licensed.

20 Also, each unit was designed to use a 21 cooling tower to dissipate heat from the circulating 22 water system. TVA subsequently incorporated a 23 supplemental cooling to the tower basins. And 24 depending on plant -- or on environmental conditions,

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about 100,000 or 130,000 gallons per minute of water from a deep water intake above the Watts Bar Dam is routed to the basins and then back to the river. This added cooling allows the -- allows Unit 1 currently to obtain full electrical output during, you know, certain environmental conditions.

Next slide. Again, I would like to say, you know, because TVA will also be covering the history of engineering construction and licensing of Watts Bar as part of its presentation, I'm just going to hit right now on a few of the major highlights that have taken place over the past years.

TVA began initial construction of both 13 14 units in early 1973. And construction progressed 15 until 1985 when TVA felt that Unit 1 was nearly 16 complete and ready for its operating license. However, because of the identification of a number of 17 construction performance deficiencies as 18 Mr. Rav 19 initially alluded to, the NRC required TVA to come up with a Performance Improvement Plan. This was in the 20 form of a letter to TVA under 10 CFR 5054. 21

TVA submitted its plan which incorporated both corporate and plant-specific elements. The staff documented its -- these plans and the review of

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these plans in another NRC report, NUREG-1232, including Volume 4, which was specific to the Watts Bar site. And some of the corrective action plans, however -- or excuse me. Some of the corrective plans -- corrective action plans that you will be hearing about later on were reviewed in this NUREG and also were documented in safety evaluation report NUREG-0847.

9 Looking at this history, you will see that the -- the dates up there and again, you know, 10 11 from 1985 through the 1986, there wasn't much going 12 And indeed, in April of 1986, TVA rescinded its on. certification that the plant was ready for licensing 13 14 and informed us that they weren't seeking an 15 operating license at that time.

Next page. After TVA addressed the deficiencies, economic conditions had changed and it decided to only proceed and finish Unit 1. Unit 2 was placed in a deferred plant status, as defined by the Commission's policy statement on deferred plants.

This -- with regard to Unit 2, Unit 2 stayed and had deferred plant status and as Mr. Giitter initially said in early 2007, TVA began discussions with the Commission about the possibility

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of finishing construction Watts Bar Unit 2.

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And on the basis of these inquiries, the Commission issued an SRM, a Staff Requirements Memorandum, which provided direction on the licensing and inspection of Unit 2, should TVA decide to reactivate construction.

CHAIR RAY: Now, let's stop here just for a second.

MR. MILANO: Yes.

I think as the Subcommittee 10 CHAIR RAY: 11 and then eventually the Full Committee perhaps 12 considers the issue at hand presently, this long passage of time from the mid-80s to 2000, to start 13 with when the Unit 2 was put in deferred status and 14 15 then on until now is going to present questions, 16 particularly if the question a hand is, as you have put it before us which is, are we starting at the 17 18 right point, requires us to ask about well, what was 19 going on at Unit 2 during this long period of time? My God, that's 20 plus years. 20

And there was 15 years between the time that the work stopped pretty much and when the plant was even put in deferred status. So how do we get our arms around this question of are we starting at

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the right point in looking at Unit 2, given this period of time?

And in looking through what we have been 3 4 given so far, and I know TVA will no doubt speak to 5 this, but I would like to hear from the staff and particularly perhaps from the region, what can we 6 7 assume about what went on during this very long 8 period of time, relative to Unit 2? And I'm not sure 9 I see that presented here very clearly. I just want 10 to tell you that now, because it may influence what 11 you and others say during the balance of your 12 presentation.

MEMBER BONACA: Yes, I would like to add 13 I mean, the issue of layout. 14 to the same call. I 15 mean, it's not clear what the quality of the layout was during this period of time. There have been 16 variation apparently. We need to hear about that. 17 And most of all, how then the construction, this 18 19 issue of adequacy or not adequacy, layout is being addressed, which really goes in the same. 20

21 MEMBER MAYNARD: Yeah, and I think both 22 from the applicant's perspective and also what was 23 the NRC doing, what inspections and stuff were going 24 on, so from both perspectives.

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CHAIR RAY: So that period of time more than what the review of regulatory approval status might be, which is a necessary thing to do, but we are very interested, as you may hear in this period prior to the time when work resumes and the different phases that apparently existed for Unit 2 in that period.

8 MR. MILANO: Okay. Well, I would like to 9 say in this, before I ask for some support from Mr. 10 Haag, who is the Branch Chief in the Division of 11 Construction Inspection, Branch 3 in Region II, with 12 about regard to your aspects what types of inspections, I would like to make a few statements 13 14 here.

15 And TVA is also -- I'm aware that during 16 the course of their presentation, they are going to 17 into -- they can provide more of the qet true 18 hardware details to answer this type of question. 19 During the time period where TVA in a sense put the plant into a deferred status, even though the actual 20 21 deferral statement wasn't made until a later time, 22 but since -- during that time period where they 23 deferred construction to the point of deferral and 24 stuff, basically doing TVA was а preventive

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maintenance program on the equipment that they, you know, felt essential, the safety-related equipment and such and other high- investment pieces of equipment.

The -- however, as time progressed and they did -- you know, it looked less likely that they were going to finish Unit 2, the amount of preventive maintenance and the scope of preventive maintenance had somewhat changed in terms of, you know, what they were doing on these pieces of equipment.

11 Now, at this time here and looking back 12 as to what, you know, is the current state of the 13 plant in terms of starting construction, restarting 14 construction, TVA has gone through an extensive 15 series of walk-downs to actually determine where --16 you know, what the current state of the material 17 condition of the facility.

In addition, they have provided to us and these plans are currently under review by Region II. They have a refurbishment program which defines what they need to -- how they are going to approach, you know, the repair, replacement, rework of various components that they -- that are defined under these walk-downs that, you know, need to be refurbished.

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And also they are restating, you know, other things that wherein they -- preventing further degradation of the current equipment at the station.

With that, I would like to turn it over to Mr. Haag, who can further elaborate on what the inspection activities were.

7 MR. HAAG: Good morning, my name is Bob 8 Haag. Mr. Ray, I'll try to talk about that during my 9 presentation as far as what inspections we had done 10 during time frame that you mentioned from the mid-80s 11 up through the '90s and give you that historical 12 perspective as far as what our review was related to.

I'll also talk about, you know, what we looked at upon TVA's reactivation of construction and what our future plans are as far as looking at that aspect of the equipment sitting idle for an extended period of time.

18 CHAIR RAY: Okay. That's well and good, 19 fine. Ι just wanted to make that -- Members, Subcommittee Members have commented as well, try and 20 21 I'm not sure that it is just the address that. 22 physical equipment that we are talking about. When 23 we are talking about a starting point, it's the 24 starting point for the review, correct?

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That's a question that has different ways of thinking about it and looking at it. And I'm not sure how to answer it particularly, but it's the question that we are being asked anyway. And this hiatus and there has been comment made by Pat here now about prior to the time of deferral it actually was kind of a deferral treatment that was occurring.

8 At this point, since the NRC is here 9 before us, we are really interested in what the NRC 10 did and has done, and you'll speak to that, and not 11 so much what TVA has been doing to reestablish and 12 reverify the material condition of the plant. We will continue on with that background. 13 Enough.

Well, if you don't mind, I 14 MR. MILANO: 15 would like to make one statement with regard to the 16 licensing basis starting point, if you don't mind? 17

Sure.

CHAIR RAY:

18 MR. MILANO: When the staff was going 19 through its framework assessment to determine the starting point, which I'll talk about again in a few 20 21 minutes and stuff, we also realized that there is a 22 likelihood that things that we already -- that we 23 believe are closed, that are closed within, you know, 24 the topics were closed in previous supplements, the

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original and previous supplements of the SER, that they could be reopened for various reasons.

And we identified this issue and had 3 4 discussions with TVA about it. And because of that, 5 TVA has come up with a program for basically determining if things that were previously reviewed 6 7 should be reopened for staff review. And if so, they 8 And we will document that fact, you know, will be. 9 in future supplements and stuff. And it's a 10 relatively extensive program of what needs to be done 11 in terms of looking back and looking in the future as to whether or not conditions have changed that would 12 require the staff to reevaluate something that we 13 currently consider closed. Okay. 14

MEMBER ABDEL-KHALIK: Wouldn't that taskbe more appropriate for the staff to perform?

17 MR. MILANO: What the -- actually, we 18 felt it would be more appropriate for TVA, since TVA 19 is responsible for providing us, you know, the licensing information for the staff to review. We --20 21 however, I agree with you the staff needs to look at 22 this and that's part of the reason why we asked TVA 23 to put this program or make this program a submittal 24 for staff review and we fully expect that we are

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going to audit this program to make sure that we agree that all the actions taken to address the various conditions that could cause a reopening of a topic area are, indeed, right and TVA has been properly implementing it.

MR. GIITTER: The staff has always -- you 6 7 know, has prerogative to go back and look at any 8 issue that was considered to be closed and reevaluate 9 it and do, as Pat indicated, an audit of any suggestions that the licensee makes to make sure that 10 11 we have the reasonable assurance that those items 12 that were closed, in fact, should have been closed. So that's always something that the staff has the 13 prerogative to do and plans to do. 14

MEMBER ABDEL-KHALIK: Thank you.

16 MEMBER BROWN: One observation on that. 17 If you go through Supplement 21, there is tons and 18 tons of the items listed --

MR. GIITTER: Yes.

20 MEMBER BROWN: -- to be looked at that 21 are listed as resolved.

MR. GIITTER: That's correct.

23 MEMBER BROWN: And I think your statement 24 is very clear. You said how you may reopen some of

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1 those, but what was not -- I don't know, I think what Said was talking about, was my thought process, is it 2 3 doesn't look like there was an assessment yet of 4 those resolved items and which ones flow to the top. 5 And some -- you can read some of these and say oh, okay, that probably would -- resolution probably 6 7 would be accepted and have no problem today, but 8 there was no layout or assessment of some that may be 9 a little bit more critical of a higher level of 10 thought process that you might want to go back 11 through.

12 So it looks like right now you are going to get a ton of information and tendency would be 13 14 that well, all that stuff that was really resolved 20 15 years ago is resolved, because we've got so much on 16 our plate now, it's hard to go back and pull the string on those. And particularly if you look at the 17 18 time frame within which you want to operate. I mean, 19 doesn't their construction permit right now going out to what 2013 or something like that? 20 21 MR. GIITTER: Yes. 22 MEMBER BROWN: They've got a very short 23 window. 24 So my concern is that -- and I'm not **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1 talking about people literally, that's just the 2 tendency --3 MR. GIITTER: Right. 4 MEMBER BROWN: -- when something has been 5 resolved 20 years ago, you don't really know what the 6 applicability of that resolution is relative to what 7 you know today. 8 MR. GIITTER: Right. 9 MEMBER BROWN: So that's --10 MR. GIITTER: It's a good comment. Now, 11 you know, as I said, we do plan to do audits to make 12 sure that we are satisfied with those items that were considered to be resolved, that they are, in fact, 13 resolved. 14 15 MEMBER BROWN: Is there going to be kind of a listing of you have gone through them, these are 16 the ones we think are okay and these are the ones we 17 18 want to reopen and a basis for that or something like that be available? 19 20 At some point in time we MR. GIITTER: would, but we are not at that point yet in the 21 22 review. I mean, that's -- right now, if you go back 23 and you look at where -- you would have to make the 24 call as to whether they are resolved or not. And **NEAL R. GROSS** 

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26 1 those issues were resolved based on past precedent, you know, past reviews. But we still need, as Pat 2 indicated, to do an audit to make sure that we are 3 4 satisfied with that. 5 And in terms of a priority, you know, we 6 have to use good engineering judgment, good judgment as to which of those issues are more important than 7 8 others. 9 MR. MILANO: Also, I would like to 10 mention, too, that although the description that is 11 provided in Supplement 21, you know, is not lengthy, 12 the --13 MEMBER BROWN: It's zero. 14 MR. MILANO: Well, I hope not. 15 MEMBER BROWN: There is a listing of the 16 item that says resolved and it says what the subject was and that's about all. 17 18 MR. MILANO: What I'm --19 MEMBER BROWN: And I'm not criticizing that. I'm just --20 21 MR. MILANO: I understand. 22 MEMBER BROWN: -- making the point. 23 MR. MILANO: No, what I was trying to say 24 is there is a short description of the processes that **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701

went on in terms of developing the issues of open or resolved. However, that doesn't capture the total breadth of the -- what the staff did over the past two years in determining what was open and what was closed.

When the original request came in to 6 7 reactivate, we asked each one of the applicable staff 8 to review their sections and in that, to review just 9 that, whether things should be open or closed. They 10 went back and reread the applicable sections in the 11 original and all the supplements and that's why we --12 in NUREG-21, you will see wherein we both for open and resolved, we list each one of the -- each time 13 that that subject was discussed in, you know, the 14 15 prior supplements and stuff.

And with that, the staff looked at it and things are going to change. You know, our current conclusions, you know, could -- are likely to change in some areas and stuff. But the staff, after reading that, came -- you know, felt that these are the currently open sections that needed, you know, to be resolved.

I think Mr. Raghavan wanted to make a statement, too.

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MR. RAGHAVAN: Yes. My name is Raghavan. I'm the Branch Chief in the Division of the Active Licensing. I'm responsible for the Watts Bar Unit 2. Basically, we took two steps. Step No. 1 is to determine, go back, look at the 20 supplements that have taken place over the period of 20 years and licensing one-by-one. Many of those supplements include Watts Bar Unit 2 review as well.

9 So we wanted to go and take a look at it 10 just say has any particular issue has and been 11 specifically reviewed and approved by the staff? Τf 12 so, in what supplement it was reviewed? So that's what we did in this particular document. That's Step 13 That is not to say that this is resolved and 14 1. 15 closed for operating license.

16 You put a big caveat by saying that. This is our starting point. This is what we think 17 that we have done based upon our review of the last 18 20 supplements. If any of these issues when you are 19 looking at any other topic that TVA submits, we will 20 21 looking at and I just say whether this new be 22 submittal that comes in, whether this new plan that 23 they have submitted does that affect any of our previous review? 24

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That's the program that we wanted TVA to have. TVA would submit it and we would also continuously review. To go back to the Supplement 21, I have to second what Mr. Pat Milano said, this document even though it looks more in terms of pieces of paper, this is a compendium of a review of 20 supplements that ranges about 300 topics of the standard review plan.

9 It is also the -- they also reviewed 10 1,100 generic communications dating back to about 11 1971. We looked at 29 corrective action programs and 12 special programs that have been reviewed and approved NUREG-847, Supplement 13 in NUREG-1232 and also 5 So we looked at all those things and 14 through 20. 15 technical staff looked at it and they wrote the safety evaluation. And it is documented and it is 16 referenced here, right? 17

MR. MILANO: Yes, it is in the back.

19 MR. RAGHAVAN: So this to me is the 20 starting point of where are we? We left it 20 years 21 ago and now we want to establish where are we 22 starting now. But the starting point is for the 23 purposes of review where we want to start. But as 24 along in the future part as the progress two

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questions will have to be kept in our mind.

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No. 1, going forward is this a new topic that has not been resolved? We need to be looking at it using the current requirements.

The second thing is in so doing, any of the topics that we had previously reviewed and approved, do they continue to remain valid? If not, what do you have to do about it?

9 That's where I think that's the starting 10 point.

11 MEMBER BONACA: Let me ask you a question 12 again about the physical plant. For Browns Ferry 1, a review was performed by TVA to determine whether 13 14 the layout was adequate. In some cases it was not. 15 And also to determine if the inspections, specific inspections and components would be sufficient to 16 17 qualify the component's 40 years life. And they 18 concluded that in many cases they could.

And in fact, the result of it was a 19 piping, especially in 20 measure of grade of the secondary side for Browns Ferry, if I remember. 21 So 22 now, I heard before there will be inspections being 23 done on components to determine the status. In some cases the conclusions may be similar to what they got 24

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for Browns Ferry. I mean, the plant has been down for 20 years or more.

And the question I have is what program is underway to address this issue, the qualification of the physical plant? Because you know, a lot of things are here on the list of open items and some before had to do with the licensing actions, status and some support. I just wonder about the physical plant.

10 again, this early MR. MILANO: Now, 11 portion of the presentation is strictly focused 12 towards the licensing reviews that need to be done. TVA and also our construction inspection section 13 will, you know, give you a better understanding of 14 15 what was done to assess the current state of the facility and -- you know, determined by the extensive 16 walk-downs that took place and also by Region II's 17 assessment of these walk-downs and the current state 18 19 of readiness for -- to restart construction.

20 MEMBER BONACA: There is a process 21 underway in parallel?

22 MR. MILANO: That's correct. That's 23 correct. And that's why I'm not talking about it 24 now. I'm just focusing strictly on the licensing

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1 reviews that need to get done. MEMBER BONACA: But we need to hear about 2 3 this. 4 MR. GIITTER: You will hear about it 5 today from Region --6 MR. MILANO: You will hear about it later 7 on. 8 MEMBER BONACA: You know, in the future 9 at some point, I mean, that's --10 MR. MILANO: No, we -- because I'm 11 putting it off until a later time doesn't mean that 12 and NRR don't feel that that's important, you we We agree with you and we feel the same way. 13 know. It's just that it is being covered under separate 14 15 portion of the overall programs that are being done to -- leading to the potential for issuing an 16 operating license. 17 18 MEMBER BONACA: Yeah. And this the last 19 comment I have, because for Unit 1 at Browns Ferry, they did a superb job, in my judgment. 20 I mean, they 21 did review components and they had dealt with them 22 and they eliminated the issue of layout for most 23 components. And so I would have expected they will 24 have the flows behind us.

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MR. MILANO: Right. And TVA plans to 1 2 discuss that aspect, again, with you when they come 3 up. 4 CHAIR RAY: Well, you will be back this 5 afternoon. MR. MILANO: Yes. 6 7 CHAIR RAY: So we can pursue that. 8 What you are asking us to MEMBER SIEBER: 9 do is to make the separation between the licensing 10 effort and the physical plant condition and the 11 construction effort? 12 MR. MILANO: That's correct. 13 MEMBER SIEBER: Okay. 14 MR. MILANO: That's correct. 15 CHAIR RAY: Very well. Maynard? 16 MEMBER MAYNARD: Oh, sorry, my turn? 17 MS. BANERJEE: If I may point out in the 18 staff's Supplement 21 of the safety evaluation 19 report, the staff did recognize and point out that some of the issues, some of the outstanding issues, 20 21 you know, and generic communication there may be a 22 need to reopen them as a result of, you know, 23 circumstances that may arise. So it's not, how do 24 you say, an open and closed case here. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1	MR. MILANO: That's right.
2	CHAIR RAY: Well, yeah. I that's the
3	case. There it's also stated here that design
4	features and administrative programs are found to be
5	in compliance with the regulations of Unit 1 and will
6	likely be acceptable for Unit 2. Well, I think
7	that's axiomatically true. On the other hand though,
8	let me turn to, for example, in Supplement 21 there
9	is a section at the back on called Quality
10	Assurance, Section 17.
11	The only thing that is discussed in here
12	is the ASME Code
13	MR. MILANO: That's correct.
14	CHAIR RAY: standard. There is
15	nothing discussed about the Appendix B program more
16	generally.
17	MR. MILANO: No, because, at this point
18	here, we weren't making any decisions with regard to
19	the quality assurance program in terms of licensing.
20	TVA's quality assurance program that is in place was
21	reviewed and approved by the staff and remains a
22	site-wide quality assurance program that, indeed,
23	they are implementing and living to. And this was
24	also reviewed in terms of the construction readiness

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Region ΙI did in making its assessment that determination that TVA ready to restart was construction.

They, indeed, verified that the quality assurance program, you know, that the procedures and stuff were in place to implement it successfully.

> CHAIR RAY: Where is that described? MR. MILANO: Um --

9 MR. HAAG: That would be -- you could take a look -- or we would have that document in our 10 inspection report that has the results of 11 our 12 readiness inspection and in addition our quarterly inspection reports, you know, where we talk about the 13 14 reviews of the quality assurance program, 15 implementation of oversight by TVA.

16 Well, frankly, that's not CHAIR RAY: 17 very accessible to us. And you know, again, you hear 18 it in various ways from us, but our interest is in --19 you know, there is no down -- after all we are talking here about circumstances that arose from a 20 21 breakdown in a programmatic breakdown, right? And 22 then there was an NPP that was implemented.

23 One has to assume that for Unit 1 it was 24 exactly sufficient and adequate. But it is very

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1 vague and murky as to where that program stands relative to Unit 2. And you know, you have got a 2 discussion in here, as I say, about transferring the 3 4 N-stamps, but there is nothing that is accessible to 5 us that gives us any way of coming to some conclusion about are we starting at the right point relative to 6 7 Units 2 and the programmatic issues that were 8 addressed in Unit 1, but may not have been addressed 9 in Unit 2. There's no way of telling, except if you 10 go through the inspection reports, which we aren't 11 prepared to do, I don't think.

12 MR. MILANO: And we are -- we plan to -as you will see -- as you saw in terms of Supplement 13 21, there was a section of the review that covered 14 15 corrective action programs and special programs. 16 Those corrective actions and special programs were an implementation of 17 outcome of the а performance improvement plan as, you know -- that was identified 18 in NUREG-1233. 19

CHAIR RAY: Yeah, okay. I'm interrupting you and I apologize for that, but let me just -- we are okay on time, but we do need to move on here. But the point is that how that was done for Unit 1 versus Unit 2 is the issue. And so often the

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discussion has to do -- these very fine recovery programs and they were implemented satisfactorily and nobody is going to raise a question about that, I'm sure.

But with regard to Unit 2 it is very unclear, at least in what we have been able to 6 review, where the programmatic \_\_\_ from the NRC 8 perspective. TVA will speak Now to their own programs. But from the oversight of the corrective action and I'll just use Appendix B as an example, applicable to Unit 2, where did it start?

Well, it may well be fully covered in the 12 inspection reports, but we don't have really the 13 ability to digest all of that and come to some 14 15 conclusion about it. And we are looking -and perhaps we will now just defer this to Region II this 16 17 afternoon and we'll talk about it further. But this is a question, at least in my mind, that I can't --18 the subject of walk-downs and testing this and that, 19 fine that needs to be done. We need to be sure it is 20 21 adequate.

22 But I don't understand how you pick up the thread on the programmatic side relative to Unit 23 24 Just leave it there. 2.

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MR. MILANO: Okay.

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MEMBER SIEBER: There may be some value, at least for me, to look at the inspection reports that identified the breakdown. There probably is no more than half a dozen of them, but identify the situation just so we understand what the framework is that contributed to the delay in which must be overcome in order to restart the construction and eventually license the plant.

10 So I would sort of like to ask if 11 somebody could do a little research about that and 12 provide me with those inspection reports?

This is Maitri Banerjee 13 MS. BANERJEE: I guess it's mu fault. I didn't go into the 14 aqain. 15 inspection report area, because I thought that let's 16 hear what they have to say and then I take upon myself an action item to work with the staff and get 17 18 the Committee the needed inspection reports or a 19 summary of, you know, some sort of derived document.

20 MR. GIITTER: We can provide you with any 21 inspection reports you want, but as you indicated 22 that, you know, I don't know how much time you want 23 to spend pouring through inspection reports, but we 24 will be glad to provide you with whatever reports you

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MEMBER MAYNARD: Oh, I don't think the key is so much as to what happened back then, because I believe -- I'm confident that it was resolved for Unit 1. I think the real key issue for me is what thread ties it -- also applies to Unit 2? I mean, what really ties you to 2 into this in whatever has been done to resolve the issues for Unit 1. How does that thread tie to Unit 2?

10 MR. MILANO: Yeah, the thing is the 11 implementation has, for the most part, not been 12 completed on Unit 2.

MEMBER SIEBER: That's right.

14 MR. MILANO: About in September of this 15 year, TVA came -- or excuse me, September of last in with a sizeable 16 year, came letter and TVA documentation which went through each one of the sub-17 issues that are embedded in these 29 corrective 18 action programs and described, you know, what was 19 done on Unit 1, what was the program that was done on 20 21 Unit 1, what the current state of implementation is 22 on Unit 2 and, for the most part, they indicated that 23 the same program will be used and implemented on Unit 2 and the staff will review it, the inspection staff. 24

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There were some areas and -- about three areas where the staff needed to -- TVA wasn't going to do exactly what they did on Unit 1 for various reasons, in particular, issues with regard to cable and electrical. And also, there was refurbishment and QA records wherein they want to do something that programmatically the staff finds that it is probably better than what was done in the past.

And we are reviewing those things now and
we will make a determination on them. And the region
and -- will be inspecting implementation.

12 MR. RAGHAVAN: This is Raghavan again. Ι just would like to take this to the philosophical 13 step as to how we want to do this corrective action 14 15 There are 29 corrective action programs and program. We just generally call it 16 special programs. as 17 corrective action programs.

29 18 What happened was the corrective 19 action programs have reviewed and approved NUREG-1230 to Volume IV for Unit 1. And the implementation of 20 21 those corrective action programs were reviewed and 22 approved in the NUREG-847 as part of safety 23 evaluation, Supplement 5 through 20.

What we wanted to do was two things. No.

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1 is whether the corrective action program programmatically has TVA plan, which was implemented Programmatically is it acceptable for in Unit 1. Unit 2? At the present time, 20 years have passed, at the present time would the NRC look at it and just say this program is still valid, that there is no other requirement, those approaches are not valid for Unit 2 or are valid for Unit 2?

9 That's the decision we wanted to make. 10 looked it Having made that and we at and we 11 documented some of those things, the next step that 12 we want to do is if this program is not acceptable 2, 13 for implementation on Unit have they been 14 implemented properly or not? That's the region's 15 responsibility to go and look at the implementation.

16 In certain cases, I think the one -- the three cases that Pat pointed out was the -- regarding 17 the cable issues and the electrical issues. 18 TVA chose to do certain things slightly different from 19 what did in Unit 1. Not that what was done in Unit 1 20 21 was bad or did something, they wanted to do a little 22 better or they wanted to make the inspection for the benefit of ease of construction. 23

And those are all the issues that we are

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currently working on right now. They are programmatically okay, slight changes from Unit 1 and now we are looking at it programmatic, whether this approach is valid for Unit 2 or not. That is where we are stopped right now. The implementation, how they implement these programs that they will will be the subject matter for discussion in the next few years to come.

9 I think, you know, you need to explain 10 what you intend to do.

CHAIR RAY: Let's -- region will be up
this afternoon. You will be back this afternoon.
Let's go ahead with your presentation.

14 MR. MILANO: Okay. Okay. Getting back 15 to this and we have covered some of these things, but I'll just fly through it hopefully pretty quickly. 16 Again, as was -- as I started to say, in August of 17 18 2007, TVA submitted its letter indicating that they 19 were going to reactivate the -- that they would like to reactivate construction of Watts Bar Unit 2. 20 That 21 was in the form of a 120-day notification that was 22 required under the Deferred Plan Policy Statement.

And the staff -- that -- at that point, the staff and TVA began a process of independently

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identifying/verifying the remaining licensing reviews that needed to be resolved and I'll talk about that in a little bit more detail shortly. The result of that effort was what you are looking at here, the documentation in Supplement 21 of the -- of NUREG-0847, the safety evaluation report.

And that supplement describes the process that was used, albeit, that it is relatively terse and you have to go back to the -- some of the documents that are referred to in the appendix that's on the -- that was attached to Supplement 21.

12 Because 30 years has elapsed from the date of the initial submittal 13 of the operating license application and because there has been a 14 15 lengthy period of inactivity in the staff review while the facility was in the deferred status, the 16 staff has requested that TVA update and reaffirm the 17 This was done by TVA in a March 4<sup>th</sup> 18 application. 19 application update this year.

With that, that concludes the background information that I was planning to present. And barring any other questions, I can go right into a little bit more detail about Supplement 21 itself.

CHAIR RAY: Yes, please.

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MR. MILANO: Um-hum. Okay. I'm going to progress through here and if this is a little bit too much detail or it isn't enough, please, stop me as you have been doing.

5 Aqain, in the background section Ι 6 referred to the fact that after TVA came in with its-7 - you know, notifying us of its intent to -- or its 8 review with the hopes of coming in and requesting a 9 restart of the facility, the Commission issued 10 guidance to the staff in the form of an SRM in July 11 of 2007. And this Staff Requirements Memorandum SECY-07-0096 provided the basic considerations that 12 the staff was to do if TVA should come in and 13 14 formally request a restart.

Foremost, the Commission directed that the staff use the Unit 1 current licensing basis as the reference for licensing Unit 2. This approach maintains the fidelity of the design between the two units and ultimately will allow operator licensing on both units.

In addition, the Commission directed the staff was to review any Unit 1 exemptions, relief requests or other actions to determine whether the same allowance was appropriate for inclusion in the

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design of Unit 2. The Commission also noted that significant changes to the licensing approach would be allowed where NRC has backfit that rule would be met or is necessary to support dual-unit operation.

The Commission encouraged the incorporation of updated standards for Unit 2 where it wouldn't significantly detract from the design and operational consistency between the two units.

9 CHAIR RAY: How are you affecting that 10 encouragement?

11 MR. MILANO: That encouragement is being 12 done, and you will see it in the next portion of the presentation, but I'll jump ahead a little bit, after 13 the staff received this guidance, we started looking 14 15 at what would be the best means of implementing the quidance along with the fact that we, you know, have 16 had this hiatus since 1996 of no new construction 17 18 licensing within NRR.

19 So we felt that the best approach would be to provide a detailed procedure for the staff to 20 21 follow. And this is our office instruction, L-I-C 10 22 -- excuse me, 110, LIC-110. That document brings to 23 bear in the section that talks about staff 24 expectations and responsibilities for its review. Ιt

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covers this portion. It is incorporated into it. I'm going to be going into that shortly.

Lastly, the staff and TVA were to look at opportunities to resolve generic issues whether the unirradiated state of Watts Bar 2 would make it easier to resolve, at this time, than at Unit 1. And a couple of examples of that are in the area of GSI-191, the sump strainer issue.

9 TVA is installing the strainers, you Also, the staff 10 know, now in the current licensing. 11 -- while the staff was dealing with that subject with 12 Unit 1, there was -- they were reviewing issues related to the fibrous loading that could take place 13 on the -- even the new strainers. 14 And there was 15 identified some cable wraps that would, if -- could be assumed to provide a significant amount of fibrous 16 material. 17

And what TVA is planning to do is go to a different, you know, a different cable wrap on those questionable, you know, sections now rather than wait until it is fully resolved for Unit 1.

And also, with regard to the bottom mounted nozzle inspections, when we were reviewing TVA's response to the generic communications on that

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subject, we had dialogue with TVA wherein we questioned whether or not they were going to redesign the bottom head installation package to make it more or easier for them to drop it and also to provide better access to -- for visual inspection of the bottom mounted nozzles.

So we are, indeed, looking at these issues and have been actually implementing these issues as we go through the reviews, even though we -- you know, we are not too far into the review process right now.

12 MAYNARD: Ι would like MEMBER to encourage taking even a little bit broader view of 13 14 the generic issues. I was going to talk to the 15 applicant about it when he got up here. It's also an opportunity for any operational issues that they have 16 had or other problems in the past with the plant that 17 18 may not have risen to a generic issue or a GSI or 19 something like that, but now is the time to take care of any of the operating experience issues that would 20 21 be hard to resolve once fuel is loaded and radiated.

22 MR. MILANO: Okay. Jumping over and we 23 have already talked a little bit about this, this is 24 our office instruction LIC-110. Again, to restate

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of the long period of time since because the licensing of Unit 1, which of course was the last licensed 50 be under Part of the plant to regulations, NRR management determined that it needed to provide its expectations for accomplishment of the operating license review for Unit 2.

7 In addition, the Commission quidance 8 needed to be captured in a working level procedure 9 for the staff to follow. And because of that, the 10 Director of NRR decided that, at the time, Mr. Dyer, 11 the best vehicle to accomplish these objectives was NRR office 12 NRC to issue а new \_\_\_ excuse me, Thus, office instruction LIC-110 was 13 instruction. developed as the tool to bring together the overall 14 15 management and oversight of the operating license review project. 16

And as you can see by this -- down this slide, these are the areas, the basic areas. There is a lot more information in it and I believe I have already provided a copy of the office instruction to Ms. Banerjee earlier. And if you would like -- if you want to go into any of these things, we can go through it.

In terms of this office instruction

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compared to a lot of other ones, this one does -because of the fact that the operating license review is -- goes beyond NRR, there is aspects of security and EP that are handled in NSIR. There is aspects of the Part 70 licensing for fuel receipt and stuff that NMSS will be doing.

7 We attempted to capture all of that in 8 this office instruction, albeit, that how they -- how 9 those staffs do their review are handled by their own 10 instructions, but we do bring out these points in 11 here. So it's a besides giving a detailed direction 12 it also helps the to NRR, NRR management to understand how all these other issues are being 13 captured in the overall progression of licensing. 14

And it also talks about, you know, future reviews that -- as we are doing here with the ACRS staff and it also, you know, talks to some extent the possibility of ASLB hearings and stuff like that.

19CHAIR RAY: Okay. Now, it includes20setting -- it includes defining, I'll call it,21something called the Watts Bar Unit 2 Reactivation22Assessment Group?

MR. MILANO: Yes.

CHAIR RAY: And it says the specific

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1	charter for this group, including organization
2	reporting responsibilities, will be established prior
3	to its implementation. Has that occurred?
4	MR. MILANO: No, it has not. We are
5	still in the development of the charter itself.
6	CHAIR RAY: When will it occur?
7	MR. MILANO: It will occur probably some
8	time later this summer. That's our expectation for
9	it.
10	CHAIR RAY: Well, it would seem if it's
11	needed and it appears it would be a wise thing to do,
12	that there is stuff going on now that would benefit
13	from
14	MR. MILANO: Yes, we agree with you.
15	MR. RAGHAVAN: This is Raghavan. I just
16	want to tell you I was also involved in the Browns
17	Ferry licensing transfer to Unit 1 licensing. And
18	there were a lot of lessons learned as part of the
19	branch for licensing. And we had this, what we
20	called, Regulatory Oversight Panel and that's the
21	type of thing that we would like to do in the Watts
22	Bar. And I have the draft of the how the
23	Regulatory Assessment Group is going to look like.
24	But because there were not that many
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activities going on in the assessment part of it and because we wanted to establish the regulatory framework for it as to basically the way we wanted to start it, that is where we have not gone into the Regulatory Assessment Group Charter, as I said. But as Pat pointed out, it is going to come very shortly.

7 CHAIR RAY: Well, okay. That understood, 8 I would say that that group probably represents a lot 9 of what Members of the ACRS would be interested in 10 how they are carrying out and what their functions 11 And so again, if you ask the question of the are. 12 ACRS, at this point, are we starting at the right 13 spot or however you want to frame the question, my guess is that that might be a useful thing for us to 14 15 consider in answering that question.

Go ahead.

MR. MILANO: When we issue the charter, we will make sure that a copy of it is sent over to you. Could you go back to the last one?

20 MEMBER BONACA: I had a question. As you 21 -- as they proceed with this start/activity, are they 22 expanding moving personnel from Unit 1 to Unit 2 or 23 are they simply creating a separate organization? 24 MR. MILANO: No, there is a separate

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organization for Unit 2. It's under the direction of a separate senior vice president, Mr. Bajestani and separate from the senior vice -- or excuse me, separate from the vice president that handles, currently handles, Unit 1, the station itself, Mr. Skaggs. So and also the engineering is separate. You know, all those programs are separate.

8 And similarly, the Region II inspection 9 staff we have got a separate resident inspector office that is manned. 10 And you know, there, of 11 course, is going to be dialogue between the two 12 units, especially in light of if things need to be changed on Unit 1, such that the Unit 1's licensing 13 basis changes, you know, those need to be reflected 14 15 in Unit 2. So we have this dialogue. You can't 16 separate the two totally.

CHAIR RAY: You wouldn't want to.

18 MR. MILANO: Okay. No. Also, what I 19 would like to mention, too, is the Watts Bar Project along with fire protection and a couple other little, 20 21 lesser things are also being managed within NRR under 22 the Enterprise Project Management Program. And I'm going to talk to that a little bit later in later 23 24 discussions.

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However, to mention it now, we have loaded all of the staff review effort currently into it and we planned also to load in these other tasks that are separate from the review itself, hearings, meetings, meetings with ACRS, with the Commission and stuff, so that this is a -- the schedule is a complete history of all the activities that it took from, you know, the start of this reactivation of licensing to hopefully, ultimately issuing the operating license.

11 Okay. Next slide. Okay. As Т 12 previously stated, you know, a significant amount of the review of Watts Bar was accomplished during the 13 review when both units were being considered. 14 The 15 original SER was issued in 1982 and included a number 16 that remained open for of issues further staff resolution. 17 These were done in а series of 18 supplements to the SER.

Again, as Mr. Raghavan indicated earlier, Supplements 1 through 4 considered both Units 1 and 2. Supplements 5 through 20 reflected mostly Unit 1. However, there were issues such as with common systems or overall site programs and stuff like that that, you know, it was not appropriate to look at it

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just on -- as a Unit 1 issue. And both -- it was considered for both units. And finally, Supplement 21 is the baseline for the remaining scope of review.

As you can see by this time line of activities that took place to establish the regulatory framework, it entailed a significant level of effort and required evaluation and input by a wide scope of the NRR staff, including other offices, as I mentioned, and Region II.

10 TVA and the staff independently assessed 11 the scope of topics that remained open for 12 As captured in LIC-110, the licensing resolution. project management staff evaluated and attempted to 13 correlate the staff input with that provided by TVA 14 for the safety evaluation report, topics, generic 15 communications and the corrective action and special 16 17 programs.

After resolving the differences between 18 19 TVA's assessment and NRR's assessment, the staff reached its conclusions in each of these areas and a 20 21 letter transmitting the final assessment results were 22 issued. Because of the staff's review was 23 encompassed the original and 20 supplements, the 24 staff felt that there needed to be a single document

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that captured and delineated the current status of the Watts Bar 2 review and that is again Supplement 21.

4 Supplement 21 documents the review of the 5 three major subject areas which form the basis of the 6 staff's ultimate decision on Unit 2. In general, the 7 staff's finding in these topic areas will cover the 8 processes to be performed, the operating procedures, 9 the facility and equipment, the use of the facility technical 10 specifications and will determine and provide 11 whether they collectively reasonable 12 assurance that the applicant will comply with the regulations in Parts 20 and 50 and that the health 13 and safety of the public will not be endangered. 14

15 To give you an idea of the scope of work that went in the assessment, the NRC assessed 288 16 17 topics which comprised the scope of the safety 18 evaluation report excluding introduction and administrative sections and determined that the NRC 19 had previously approved about 163 topics. The staff 20 concluded that TVA should make submittals for the 125 21 22 topics that remained open.

23 Similarly, the staff reviewed about 1,000 24 pieces of generic communications that have been

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issued since 1973, the date of the original operating license, such as information, notices, bullets, circulares, generic letters, etcetera to determine whether the NRC had previously -- excuse me, had previously reviewed and resolved the topics addressed in these for Unit 2. Excuse me, it's whether TVA and whether we agree that they have been resolved for Unit 2.

9 Based on its review, the staff determined 10 that most of the generic communications have been 11 previously reviewed and resolved. Some were 12 determined to be not applicable, you know, as you 13 know, boiling water reactors, etcetera, or other 14 plant designs, other than Westinghouse.

About 60 generic communication issues 15 resolution 16 were considered open for and/or And TVA will need to provide additional 17 inspection. submittals for these identified issues. As I noted 18 19 earlier, also the TVA developed 18 corrective action programs and 11 special programs at Watts Bar to 20 correct the construction deficiencies that 21 were 22 identified starting in 1985.

These programs were implemented at Unit 1. For the most part, TVA's plans to implement the

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approach and actions were used to resolve the items for Unit 1 without modification. And as I previously indicated, the staff is currently evaluating the acceptability of these approaches on Unit 1 and also looking at certain of the CAPs or some --

CHAIR RAY: Wait. You said acceptability of these approaches on Unit 1, did you?

8 MR. MILANO: Excuse me, on Unit 2. The 9 Unit 1 approaches for Unit 2. Okay. And so -- and again, basically, it comes down to, as we indicated 10 11 before, there are three of them or three areas where 12 we think where TVA is not going to do exactly what they did on Unit 1 to implement it on Unit 2. 13 The 14 rest of them it's a matter of are they being 15 successfully implemented or will they be successfully 16 implemented on Unit 2?

17 MEMBER BROWN: So you have concluded 26 18 of them were okay?

19 MR. MILANO: We concluded from a program of 20 review standpoint that 26 them are okay for 21 implementation on Unit 2. not They have been 22 implemented on Unit 2 and that will be reviewed.

MEMBER BROWN: Um-hum.

CHAIR RAY: Okay.

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MR. MILANO: With that, that completes my 1 2 discussion on the current starting basis for the 3 licensing review. 4 CHAIR RAY: Okay. Well, we have got 5 quite a lot of time here now, according to the 6 agenda, and so matters that we might otherwise have 7 deferred, any that the Members have, that they would 8 like to discuss, we have got ample time to do so. 9 MEMBER BROWN: Can we just bring up a 10 couple of generic type comments? 11 CHAIR RAY: As long as they apply to Unit 12 2 operating license. 13 MEMBER BROWN: Pardon? 14 CHAIR RAY: As long as they apply to the 15 Unit 2 operating license, yes. 16 You talked about MEMBER BROWN: Oh. electrical equipment. 17 18 MEMBER SIEBER: Or at least the ACRS. Stuff 19 MEMBER BROWN: about nature, generally electrical equipment like to be operated, 20 21 not sit around for 25 years. 22 MR. MILANO: Correct. Bearings in electrical 23 MEMBER BROWN: equipment, you can't inspect for that. It's a matter 24 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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of assessing whether you need refurbishment of them

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or not. I guess my question is how -- you talked about this. Somebody mentioned that a minute ago relative to electrical equipment and a couple of other areas.

MEMBER SIEBER: Well, mechanical equipment has the same issues.

8 MEMBER BROWN: Has the same issues, 9 right, pumps, etcetera. Is there going to be any --10 are we going to have to paw through, you know, a 11 thousand pages of stuff to figure out, you know, how 12 these are going to be assessed or is there going to 13 be a summary assessment of some kind that says how it is determined whether these major components, major 14 15 electrical units are really okay, even though they have been sitting there for some number of years or 16 how they have been maintained? 17

18 Obviously, the plants are not filled, so 19 you don't run the motors. More than likely they are 20 just sitting there cooking eggs or something, I 21 So I mean, are you all going to be doing quess. 22 that, such that we will have that visible in terms of 23 QA problems and how how those they have been 24 maintained and then how they are going to be

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transitioned to "an operational status?" That's just one specific area of a number of these whole things of stuff sitting around for 30 years, because that's how long it has been. It has been a long time.

5 MR. MILANO: Right. And before I turn it over to Mr. Raghavan and Mr. Haag to give you some, 6 7 you know, further information on that, from the NRC -8 - NRR standpoint, we have made a number of trips to 9 the station and observed things that are already 10 being done in this area with regard -- and TVA will 11 probably go through this in more detail with regard 12 to what they are doing in starting refurbishment.

You know, they are completely redoing the main turbine and the main generator. They are rewinding or having the austere windings rewound. And they have contracted with Siemens to do a, you know, complete refurbishment of the main turbine and generator and stuff. And those are -- and that is ongoing. So we have seen that.

20 We have also observed other, you know, 21 turbine related components. The main feed pump 22 turbines were broken down and being refurbished and 23 other things. So from the standpoint of NRR, we have 24 observed the fact that that is currently ongoing.

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1 However, that is going to be a function of the Region II Inspection Program to assess, you know, how TVA is 2 bringing that equipment back into a state that fully 3 4 meets the -- its -- their functions and comes into 5 the applicable code compliance again. And with that, I will turn it over to Mr. 6 7 Raghavan who wants to make a statement. 8 Yeah, this --MR. RAGHAVAN: 9 MEMBER BROWN: Well, let me amplify just 10 a second before you do that. Is that -- okay. You 11 picked out one of them and said what they are doing. 12 And I guess my interest is is there 100 components maybe or, you know, major electrical and mechanical 13 14 components, reactor coolant pumps. 15 MR. MILANO: Right. MEMBER BROWN: All kinds of stuff that 16 has to be addressed. 17 18 MR. RAGHAVAN: Yeah. 19 MEMBER BROWN: And is there some way to say here -- does TVA provide it or have you all asked 20 21 for a listing of all these major components and 22 systems with a specific assessment that says hey, 23 this is where we are. This is where we're going. 24 This is what we're going to do. And this is what the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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end result testing is going to be. Something that says we are going to bring all this stuff forward

from a 25 year layoff.

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MEMBER SIEBER: Yes.

MR. GIITTER: Mr. Raghavan can speak to that.

7 MR. RAGHAVAN: Yeah. This is Raghavan 8 again. In establishing the regulatory framework, 9 this is one of the big questions that we have a 10 decision block that we are putting together. A logic 11 chart of how do we license the plant. One of the 12 major questions that we asked ourselves is the -what frequents the aging phenomenon? 13

Several of these equipment have been idle 14 15 for the last so many years, 20 years, 25 years, 16 whatever it may be. And what we wanted to do is to make sure and TVA has -- we have requested TVA to 17 18 submit a program that why that this, you know, 19 program, these components whether it is electrical, 20 mechanical, whatever this component, the even 21 structures as to why they are okay for the next 40 22 years to come from.

23 So what we call that is simply we call it 24 as an aging phenomenon. That's a big block that we

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have in our regulatory framework. And I would like 1 TVA to address that part of it as to what they want 2 3 to do, how they are doing and what they have done. 4 But that's an issue that we will be looking at. 5 And of course, the inspection program 6 also should address those types of things. The issue 7 that you brought about about this turbine and all 8 this is one of several issues. 9 MEMBER BROWN: No, I understand that. It's just, you know, Mr. Ray referred a minute ago. 10 11 I mean, we've got all the stuff to get your hands 12 around. 13 MR. RAGHAVAN: Yes. 14 MEMBER BROWN: And yet, we are sitting 15 here and we are going to be asked to have an idea of an assessment. You know, hey, what do we think about 16 it and somewhere this has got to be brought together 17 in a manner in which it is covered. 18 19 MR. RAGHAVAN: What I think --20 MEMBER SIEBER: As we agreed about an 21 hour ago, we are looking at this in two different 22 viewpoints. 23 MEMBER BROWN: Well, this was open. We 24 had some time. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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MEMBER SIEBER: One of them is the licensing of the plant. The other one is to figure out what to do with the facility, how to refurbish and continue construction. In my mind, I keep those separate. On the other hand, all the points you are making are valid about, you know, having done this with another plant, restarted construction. I know a little bit about what has to be done.

9 And but in my own mind, I make the 10 distinction between the staff work and reviewing the 11 SAR to determine whether the plant is licensable as 12 opposed to what do I need to do with the physical 13 plant in order to make sure that it is satisfactory 14 to finish construction. 15 MR. MILANO: I had separated that.

MR. MILANO: I had separated that.

MEMBER SIEBER: Okay.

MR. MILANO: It's just if we hadn't had 45 minutes, you know, left over, I would have deferred this until later. Harold? I'm sorry. CHAIR RAY: That's all right.

MR. RAGHAVAN: This -- I'm sorry.

CHAIR RAY: Go ahead.

23 MR. RAGHAVAN: Yeah. Raghavan again.
24 Perhaps we should have started this and I think this

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is our fault. We jumped into the details. We thought telling you what the regulatory footprint is going to be, how did we want to do this.

MEMBER SIEBER: Right.

5 MR. RAGHAVAN: The Step No. 1 is for us 6 to determine and just say where in are we the 7 document space? Do we have all the brackets? We 8 looked at previously the viewed and approved because 9 the SRM directed us to look at the licensing basis of Unit 1 as the reference basis for Unit 2. So that's 10 11 a collection of documents that we should have done. 12 That's the Step No. 1.

13 Step No. 2 is to say even though it has 14 been previously reviewed and approved, do we have a 15 program in place to determine that they continue to 16 be remained improved. They continue to remain 17 validated, that's the second aspect of the program.

18 The third aspect of the program is in the 19 of construction and the inspection, which space reason can talk about in detail, but again they would 20 21 come up with a baseline and just say do we know, do 22 we have an inventory of what things have been done 23 before? What inspection reports have been done? 24 What do you have in place? And whether the TVA is

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66 1 ready for going ahead with construction, those types of assessments. That's the third aspect of it. 2 3 CHAIR RAY: Well, can I? Let me 4 interrupt you right there. 5 MR. RAGHAVAN: Yeah. CHAIR RAY: Because I guess that's what 6 7 I'm struggling with the most. I have no doubt that 8 TVA will do what makes good sense when it comes to 9 rewinding the turbine generator or whatever. That's 10 a business decision. What I am more interested in is 11 what are you crediting from the past and not 12 I think that's what -- I think revalidating now? that's the question you are asking us to talk about. 13 14 MEMBER SIEBER: Right. CHAIR RAY: As the ACRS. Should you back 15 16 up further than you are? Along a litany of all these 17 things that are being done, again, I don't want to 18 diminish the need to say we're doing lots of things. 19 But what are you not doing that you would do for a new plant starting from scratch? And that's what I -20 21 - for example, I used the example of the Quality 22 Assurance Program. The only thing that is said about 23 the Quality Assurance Program in the stuff that I was 24 given has to do with the N-stamp, period.

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And I can't -- maybe I could figure it out and I certainly welcome Jack's volunteering to do this, but going through inspection reports trying to figure out what it is that has been done to validate what exists. But that's the issue that we are, I think, most wanting to find out about out. Trying to figure out what is it that you are accepting without revalidating from the past?

9 Do you have a succinct way of saying --10 answering that question?

11 MR. RAGHAVAN: Let me attempt it. 12 Raghavan again. I think I perfectly understand the It's a valid question. In my -- to the 13 question. best of my knowledge, please, jump in anybody else, 14 15 we are not excluding anything from our review. Not excluding anything at all. 16

What we are -- so far established is what does the paper show? Has it been previously reviewed and approved? And now it has to be validated that what has been reviewed and approved still exists there as we assume in our safety evaluation.

23 MR. RAGHAVAN: That inspection is going 24 to take place.

CHAIR RAY: Well, okay.

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CHAIR RAY: But maybe --1 2 MR. RAGHAVAN: But --3 CHAIR RAY: Maybe this goes Excuse me. 4 mostly to the region. I don't know. Apparently it 5 does. But whether or not -- basically, what is implicit in what you are saying is if it was written 6 7 down 20 years ago and accepted at that time, then 8 that makes it okay. 9 MR. RAGHAVAN: Not by -- it has not been 10 since or for any other cases that came in. 11 CHAIR RAY: Well, okav. But. 12 nevertheless, there was a lot done after the mid-1980 period to carry forward and complete Unit 1. 13 What has been said of most value here this morning, to me, 14 15 is you are going to do this or TVA will do the same things for Unit 2, with a few exceptions, that were 16 done for Unit 1 to get it from where it was in the 17 18 mid-1980s to where it is today or where it was when 19 it received its operating license. 20 And so I think that may be the answer to 21 the question that I'm asking. Because what it says 22 is we are not going to assume anything about Unit 2 23 more than what we assumed about Unit 1 when we 24 implemented the recovery program and ultimately took

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69 1 it to the point of entering operation. Am I making 2 myself clear? 3 MR. RAGHAVAN: Yes, sir. 4 CHAIR RAY: What I'm concerned about 5 would be something that I implied from some of what I 6 read that would say the contrary, no, if it was dealt 7 with in the past, we validate that that occurred and 8 speaking about Ι heard I'm mostly, Ι think, 9 programmatic implementation issues, not the 10 regulatory footprint, which you are talking about. 11 MR. RAGHAVAN: Right. 12 CHAIR RAY: Then we will accept that. Well, I don't think that was what happened to Unit 1. 13 Why should it be what happens to Unit 2? So again, probably we are talking more about the regional

14 15 16 responsibilities here than we are the regulatory bookkeeping exercise that has to be gone through, but 17 18 isn't mainly what we are concerned about. The 19 Commission has spoken. The licensing basis for Unit 1 is going to be the licensing basis for Unit 2. 20 And that's the end of that issue. 21

We don't need to rehash that over and over again. But what is -- I'm groping with anyway, is the question that I just posed, which is well,

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what are you not doing at Unit 2, if anything, and taking at face value based on the fact that it was documented 25 years ago?

4 MR. HAAG: This is Bob Haag again. From 5 the inspector standpoint, we're going to complete the 6 construction inspection program for Unit 2. You Unit 7 know, that -- and that's divorced from Unit 1. 8 1 construction, construction programs, had already 9 been done. We're going to complete Unit 2 10 construction inspection program. Plus, we're going 11 to address these other issues that the construction 12 program never does address.

This, you know, idle equipment for 25 13 14 years. There is nothing in the construction 15 inspection program that would point us to review the applicant's efforts to do that. 16 But we recognize 17 that clearly is an important aspect. The CAPs and 18 SPs, we're going to be inspecting those. There is 19 temporary instructions that dictate we inspect and close out all 29 CAPs and SPs, so we will be doing 20 21 that.

22 As far what have credited as we 23 previously, I'11 talk little about а our reconstitution efforts where we went back and 24 we

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1 looked at the inspection record for Unit 2. And how the inspection objectives of 2 looked at the inspection procedures 3 individual either were 4 accomplished as far as sample size or where there is 5 opportunities and areas that we still need to 6 inspect. 7 And I'll give you our justification right 8 off, our position --9 CHAIR RAY: Okay. 10 MR. HAAG: -- of how we want to go 11 forward with that. 12 CHAIR RAY: All right. Well, that's more in line with what I'm --13 14 MR. HAAG: Okay. 15 CHAIR RAY: -- asking about here. 16 MEMBER ABDEL-KHALIK: Let me just followup on the comments you made about the CAPs and SPs. 17 The initial condition for implementation of those 18 19 programs for Unit 2 is now. 20 MR. HAAG: Yes. 21 MEMBER ABDEL-KHALIK: And that is totally 22 different than the initial condition when these 23 programs were implemented on Unit 1. And the issue, 24 in my mind, is how do you make the leap that these **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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programs, despite the differences in the initial conditions at which these programs will be implemented, that these programs are still appropriate?

5 MR. HAAG: The staff has reviewed TVA's 6 programs on what they want to do. And the staff will 7 accept whether that program, if implemented 8 adequately, addresses whatever the historical issue 9 is. And our job will be in the region to make sure 10 they are properly implemented as far as, you know, 11 all the actions TVA needs to take.

MEMBER ABDEL-KHALIK: But being able to make that determination, the staff has to know exactly what this initial condition is. Do they have that information at this time?

16 We understand historic. MR. HAAG: Т mean, you've got to go back and take a look CAPs and 17 18 SPs were developed back in the late '80s to address 19 the programmatic problems. And those programmatic problems existed at the station for Unit 1 and Unit 20 21 2, the work that was being done at the time, problems 22 with what quality of welds, problems with support, things like that. So those programs were implemented 23 24 to address those issues.

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The Unit 2 issues, as far 1 as we're 2 concerned, still exist. I mean, because very little work has been done on that. So therefore, TVA needs 3 4 to take these corrective action programs and address 5 whether it is weld size quality, whether it is adequacy of calculations, adequacy of other areas. 6 7 So we are going to make sure that, you know, they 8 have gone -- if they described those programs and 9 what they are going to do, we're going to make sure 10 that they have done them properly. Does that kind of 11 address what you are looking at? 12 MEMBER ABDEL-KHALIK: No, not really, not 13 really. 14 CHAIR RAY: May I try? 15 MEMBER ABDEL-KHALIK: Yes. 16 CHAIR RAY: Just to interrupt for a second, Said. 17 18 MEMBER ABDEL-KHALIK: Sure, of course. CHAIR RAY: I think he said it very well 19 and better than I did about the difference in the 20 initial conditions in Unit 2 today as compared with 21 22 Unit 1 at the time the corrective actions were 23 implemented for Unit 1. And it may be an issue that just bubbling in our minds and will ultimately 24 is **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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reconcile or resolve.

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But that is a difference. And he said 2 3 it, as I say, better than I did. And we're wondering 4 how you accommodate that difference in initial 5 conditions? Is a corrective action program that was implemented successfully in Unit 1 going to 6 be 7 equally successful at Unit 2 implemented now а 8 quarter century almost later? I don't know. It's --9 maybe it's a philosophical question as Rag said. But 10 I think that that is one issue that we are talking 11 about.

12 One might say well, I need to do some more validation, which kind of goes 13 to Mario's question of lay-up. Do I need to revalidate what --14 something that I didn't have to do for Unit 15 1, 16 because it was an immediate response to a problem 17 that existed at that time? Is that problem now 18 somehow different, because of the passage of time? 19 It may sound like a strange question, but --20 I would say --MR. HAAG: CHAIR RAY: -- it is what we are trying 21 22 to think about. 23 And from my perspective, I'm MR. HAAG: 24 not sure the CAPs and SPs will deal with this issue **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1 of aging or, you know, a lab program has not been in 2 place. But that's not to say it won't be addressed. 3 CHAIR RAY: Okay. 4 MR. HAAG: The Refurbishment Program that 5 TVA will describe to you, you know, our expectation it will address, you know, equipment motors 6 is 7 haven't been running, breakers have been sitting idle 8 for a long period of time, never been operating, out 9 there for 25 years just in their existing state. You 10 know, those have to be addressed. CAPs and SPs, my 11 perspective is, no, they are going to address the 12 historical issues that occurred, problems that occurred back in the '80s. 13 CHAIR RAY: But you know the thing that 14 15 isn't going to be addressed, I truly believe that 16 every motor operated valve and pump and so on is going to be thoroughly exercised, you know, during 17 18 the start-up program. It is going to be okay. 19 It's the design basis accident capability that is maybe in question. For example, now, I am 20 21 really dealing with apples and oranges here a little 22 bit, because on the one hand I'm talking about different initial conditions and on the other hand 23 I'm talking about well, given all the things we are 24

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going to do to validate the plant, is that going to be enough or is there something different that has been created or caused by this quite unusual set of circumstances that we are looking at here?

I don't have anything tangible other than that I realize that it is the question that I think we need to address ourselves to. Are we missing something? That's why you are here, right?

MR. HAAG: Yeah.

10 Otherwise, we wouldn't even CHAIR RAY: 11 be having this meeting at this time. And we are 12 trying to assess whether or not, at least in my case, 13 are you going to have a refurbishment program that is 14 going to rewind the turbine generator, because who 15 knows your -- you know, if it needs to be done, it 16 will get done. And I don't think we are really concerned about that. 17

But the question of the safeguards and the conditions that we aren't going to test during the Start-up Test Program are we able to be satisfied with regard to those, is where we are groping. MEMBER BROWN: Perhaps that --

CHAIR RAY: Okay. I'm done.

MEMBER BROWN: Isn't that the question

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77 1 though, the licensing basis? I mean, from the 2 safeguard standpoint? 3 CHAIR RAY: No, no, I think that the 4 licensing basis exists as, you know, a construct that 5 isn't really affected by the passage of time. It is 6 really the -- something that we would miss in an 7 ordinary restart program that we ought to be paying 8 attention to. And one of them would be a legacy, 9 Charlie, of the past that we didn't properly address. 10 Well, no, that's what I MEMBER BROWN: 11 was getting at. 12 CHAIR RAY: Because it's so damned hard to figure out well, what did they do for Unit 1 for 13 14 sure. 15 MEMBER BROWN: Yeah. 16 CHAIR RAY: I mean, that's a long time And to say well, I'm going to do exactly the 17 aqo. 18 same thing on Unit 2 that I did on Unit 1, I mean, I 19 just have a lot of skepticism about that, because I don't -- you know, everybody was engaged at that time 20 21 and they did things that I'm not sure we can figure 22 out today reliably. 23 MEMBER BROWN: Can I --24 CHAIR RAY: And say I'm absolutely going

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78 1 to do on Unit 2 what I did on Unit 1. MEMBER SIEBER: The only way you can do 2 3 that is if the records exist. CHAIR RAY: Right. 4 5 MEMBER SIEBER: And in some plants they 6 exist and other plants --7 CHAIR RAY: That's right. 8 MEMBER SIEBER: -- not all of them exist. 9 So you may have to do some things over just to be 10 able to re-prove --11 CHAIR RAY: Yeah. 12 MEMBER SIEBER: -- that the situation you are addressing is properly addressed. 13 CHAIR RAY: And it won't -- that doesn't 14 15 go to the question of whether or not the bearings have to be replaced in some motor. 16 17 MEMBER SIEBER: No, you deal with that 18 otherwise. Yeah. 19 CHAIR RAY: I mean, that's just part of the job of returning the plant to safety. 20 Well, you don't want 21 MEMBER SIEBER: 22 something that -- in that stale-point failing later 23 because you didn't -- you couldn't do it afterwards. 24 CHAIR RAY: I don't mean --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

MEMBER SIEBER: You've got to have a sacrifice point.

CHAIR RAY: -- to dismiss that as something that needs to be done. That's not my point. My point really is I'm more thinking about stuff that won't be revealed by a start-up program.

The 7 MR. RAGHAVAN: Raghavan again. 8 question I have -- I appreciate the questions. Let 9 me give you a particular example. Where we exactly did that initial conditions and I'm not an electrical 10 11 engineer, so I have a backup here to be able to 12 explain it to you. In the cable issues, we exactly programs 13 one of the is the cable and the 14 electrical program and the corrective action program.

I want to explain that one particular incident where we looked at the cable issue as being different from Unit 1, because the initial conditions were different. So perhaps you can --

CHAIR RAY: Yeah, sure, go ahead. We've
got time.
MR. McCONNELL: Good morning, everybody.

21 MR. McCONNELL: Good morning, everybody. 22 My name is Matthew McConnell. I'm with the 23 Electrical Engineering Branch in Division Engineering 24 and I have been part of the team of electrical

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engineers reviewing the cable issues CAP. One of the issues that we took up was exactly the point of maybe rebaselining the fact that the cables have been installed in their place for 25 years and have essentially been sitting there.

And in that sense, we have asked numerous 6 7 questions in the area to resolve that issue to find 8 out what the actual design qualification is today. 9 And can you show that qualification of the equipment, 10 in this case, cables can still last, say 40 years of 11 the plant? And that's I think a very small example 12 of where we are at as far as reviewing the electrical components as a whole. But it is an example that we 13 14 want to make sure that we understand the importance 15 of the cable and that we have the confidence that the cables are going to be able to perform their design 16 function in accordance with their licensing basis, 17 which is in accordance with the Watts Bar Nuclear 1. 18

But we also recognize that there are newer standards, that there are newer codes out there that, I will say, enhance from what they were 25 years ago. So we are trying to address some of the conservatisms that are in place in today's standards, in today's knowledge to address the fact that the

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was licensed or when they have implemented their license.

CHAIR RAY: Let's take cable supports, if that was a deficient are, it has remained deficient on Unit 2. Does that have any long-term effect on it?

8 Well, that's still part MR. McCONNELL: 9 of our process trying to determine if that is. 10 That's something that, as far as cable supports go, 11 we're trying to -- you know, they, TVA, had submitted 12 a corrective action program for that to assess that to assure that the actual -- the as-found condition 13 14 as they are today if they were subjected to any kind 15 of harsh environment or -- I don't want to say harsh 16 environment, any environment that may possibly degrade their condition. 17

And as part of their program, they had said, essentially, they were going to follow-up what they did with Unit 1. And from my understanding and as far as cable supports go, I'm trying to recollect that --

23 MR. MILANO: Well, can I add one thing?24 And just to reiterate something that the Electrical

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Branch had looked at, they had some issues, too, with vertically supported cables. And at the -- to answer your question earlier about have conditions changed, you know, they implemented the added supports on the vertically supported cables early on in Unit 1, but they hadn't done it, you know, for 25 years.

7 The Electrical Branch asked questions as 8 fact to whether or not the that they were 9 inadequately supported and had been hanging there for 10 this length of time could that have damaged the 11 insulation in the jacket and stuff over this period And we have -- that was one of the issues 12 of time? TVA has, you know, provided further information in 13 that area as to why they feel that it is -- that the 14 15 cables have not degraded and that just installing the 16 supports now is all that is necessary.

17 Ι can't speak for the Electrical And 18 Branch, because haven't issued the safety we 19 evaluation in that area yet, but that's one of the things that we are reviewing. 20

21 MR. McCONNELL: Yeah, and we had a public 22 meeting with TVA not too long ago to discuss some of 23 the open parameters that we kind of associated with 24 the electrical cable issues and it includes the

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supports and such. And so we are still expecting information as far some as TVA goes in return officially on the docket, so we can complete our safety assessment.

It has been -- even though we have only, 6 I think, been reviewing this particular item for about 8 months now, we have come a long way. We have 8 asked a significant amount of questions in this one particular area. And I think, you know, we've done a significant amount of review to try to understand the complexity of the situation.

I think that based on the results of this 12 public meeting we had, we have, I guess, a more 13 positive outlook for the future as far as, you know, 14 15 their -- our understanding of how they are going to 16 submit the responses to our concerns. And that we really think that there is a path to success as far 17 18 the documentation of the information for as 19 rebaselining or doing something. Maybe it might entail replacing components or replacing cables. 20 But 21 all those kind of are coming into one and are going 22 to be unique based on each configuration.

MEMBER BONACA: Okay. Well, that's -it's a little bit harder for me to really separate

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purely the licensing portion from the refurbishing portion. Because I mean, if you refurbish the plant for sure that it behaves just like Unit 1, then I would say I can separate. But there will be other components probably that will be accepted as these with the understanding that, for example, take the fact at issue.

8 You know, you may have to monitor at the 9 beginning at a different pace or frequency in 10 different locations determine to there are 11 differences. If there -- the material, for example, 12 wasn't replaced, then hopefully you will have some concern about the ability of it behaving like the one 13 you have in Unit 1. 14

So with respect, you have a number of changes in programs, inspection problems and things of that kind, I don't know how much different the two plants would be from that perspective.

MR. McCONNELL: Well, I guess to kind of separate out one thing, just when we started our review understanding that the process was to make everything following from Watts Bar Unit 1 and as long as they did that, everything would be okay. We separated out that thought process. We wanted to

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look at it from a totally different objective point of view where we can say as the plant is now, given the configuration of the equipment, will -- do we have the confidence that the equipment can perform its function?

And so we strictly looked at it from Watts Bar Unit 2 configuration standpoint. So and I understand your point as far as looking forward for other components. And I think this kind of detailed review may be warranted and may be captured and hopefully -- and I think it will be captured in the inspection space.

## CHAIR RAY: John?

14 MEMBER STETKAR: Yeah. A specific 15 question that might help me to kind of separate the two things that we have been kind of talking about 16 If I look at NUREG-0847 under 17 here in my own mind. 18 corrective action programs, in particular the line 19 item that says "cable tray and cable supports," I see 20 a word that says resolved. And what I hear you 21 saying is that from my perspective in a technical 22 sense, that issue doesn't seem to be resolved. 23

23 So I'm trying to understand what that 24 word really means in this document here.

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MR. McCONNELL: Now, the cable supports themselves, that issue, the way I believe we have reviewed the aspects of the -- all the details of that review for the supports and have agreed that their program is acceptable as it stands today. I think the more issue I was trying to address is because there is different caveats as far as not supporting, cables not being supported, as Pat had mentioned.

Those -- issues like that are still on the table as far as there are a lot of sub-issues relating to cable and cable supports. Cables not being supported, that aspect is still under review. I don't have, unfortunately, my reference document.

15 MEMBER STETKAR: Ι think I'm still confused, because I'm trying to understand in my own 16 head what this word resolved in this NUREG means. 17 18 And I usually read the word resolved as situation is As far as the staff is concerned, that issue 19 final. is not on the table as an open technical issue, that 20 21 all concerns have been resolved. And I'm not hearing 22 that, so that's why I'm trying to separate out what does that resolved -- does that resolved mean that 23 24 there are programs in place that you feel confident

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1 if they are fully implemented will solve the problem or does that mean that the whole issue is actually 2 resolved? 3 4 MR. MILANO: If you look -- excuse me. 5 If you look at the heading for that column, it says 6 "Program Review Status." 7 MEMBER STETKAR: That's correct. 8 MR. MILANO: That it is only the program 9 aspect of it. Okay. What we are saying is is that 10 for the trays and the tray supports what TVA is 11 proposing to do on Unit 2 and is the same as was done 12 for Unit 1 and they plan to implement it the same as Unit 1 and the staff agrees that from a program 13 14 standpoint, that that is an acceptable approach. 15 It does not say that that has been implemented at Unit 2. And that implementation will 16 be inspected. 17 18 MR. McCONNELL: Right. And I think 19 that's far as review goes, \_\_\_ as our from а programmatic standpoint, yes, the item is considered 20 21 resolved. But what I was, I guess, attempting to say 22 and I failed to actually get the point across, was 23 the fact that they may deem that the cable supports 24 are not adequate and they may have to replace them.

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1 That's something that would be verified later. MEMBER STETKAR: That's implementation of 2 3 the program. 4 MR. McCONNELL: Correct, correct. 5 MEMBER STETKAR: Yeah. MR. McCONNELL: 6 Okay. 7 MEMBER SIEBER: Yeah, that's --8 MEMBER STETKAR: No, no, that helped. 9 Thanks. You helped. 10 You have to understand MEMBER SIEBER: 11 also that the program they have today is not the one 12 that they had when they started construction. And so what physically exists in Watts Bar 2 may not meet 13 14 the standards of the program that the staff says is 15 okay. That's where the region comes in --16 CHAIR RAY: Well --MEMBER SIEBER: -- with that issue and 17 18 you have to keep those issues separate. 19 CHAIR RAY: We are still struggling with that is the question that we are trying to address, 20 21 okay? And I think at the end of the day it is much 22 more along the lines that John just pointed out than 23 it is how to interpret the list status of resolve 24 versus open. Although, I will confess that there are **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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some open items in there that would seem to me to be in the same category from a license basis standpoint as the one you just mentioned.

And I'm not sure why they are open. But leaving that aside, the real question and I'm not sure, I'll go back to this reactivation assessment group. I can't understand why, given where we are 8 with this now and all that the Electrical Branch has been doing and so on and all that we will hear that the region has been doing, on earth isn't that group that we would crave to talk to, I guess, not in place or not even have a charter?

Because the kind of questions that we are 13 grappling with are the sort of ones that you would 14 15 think that they would address or be thinking about or something. So it just seems like in terms of what we 16 have to look at and hear about, it's hard to know 17 18 whether or not we can satisfactorily opine unless we 19 were to find some glaring omission or error here, because so much of what we really think is important 20 is in the domain of implementation. 21

22 And there isn't enough yet on the record, 23 so to speak, about the implementation that I think 24 would satisfy our interests. Other questions?

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90 MEMBER BROWN: Excuse me, can I just --1 CHAIR RAY: Yeah. Charlie, let me go 2 3 ahead and --4 MEMBER BROWN: Okay. 5 CHAIR RAY: -- let him respond and then 6 I'll be back to you. 7 MR. MILANO: I would like to just respond 8 to something that Mr. Bonaca said. With regard to 9 the physical condition of the facility, TVA has to 10 provide adequate assurance to us in terms of what it 11 has done and how it is documented. And the region 12 has to likewise do in its inspection, you know, at the completion of construction, they have to make it 13 14 clear to us that the plant has been built. 15 constructed in accordance with the design of the facility. 16 And things like you said, if they should 17 use as is or some other type of repair that doesn't 18 19 fully meet what we approved in terms of the program and the basic code standards or whatever, then that 20 21 has to be evaluated and has to be documented why a 22 use as is except -- is acceptable when the thing --23 when that component was supposed to meet certain codes and standards. That stuff will be documented 24

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and the region will inspect to that to say whether or not the use as is -- and in cases like for pressure boundary materials in accordance with ASME, it will also have to be reviewed and accepted by NRR.

5 CHAIR RAY: Okay. All right. But wait a 6 minute. What -- given that, what is the question you 7 think we are trying to address, at this point in time 8 then? Because in a sense what you said is a 9 tutelage. It's simply of course that's the way 10 Well, okay. things are done. Why are we talking 11 about it?

12 The question that -- as I said in my opening statement that you are asking is are 13 we establishing the right starting point? Well, if the 14 15 starting point is just what is documented in 16 Supplement 21, which was the answer you gave, then I'm not sure the ACRS has got anything to say really 17 other than we have checked it over and we didn't --18 19 there didn't seem to be anything missing. But -huh? 20 21 MEMBER SIEBER: Not enough detail there 22 for us to tell.

CHAIR RAY: Yeah. So again, I just wantto persuade you not to tell us what we already know,

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1 but what is it that you want us to try and conclude, at this point in time? And maybe it's a hard 2 3 question for you to answer as it is for us, because 4 this is an unusual circumstance and we are kind of 5 making it up as we go along here. But we don't want to miss the point. 6 7 MEMBER SIEBER: Um-hum. 8 And I know Rag will opine on CHAIR RAY: 9 this and, Charlie, I haven't forgotten that you have 10 got questions. 11 MEMBER BONACA: I would like to speak my 12 comment here on this. 13 CHAIR RAY: The chairman wants to speak 14 here. 15 MEMBER BONACA: Not that I really mean that, in fact, you will not verify that all codes and 16 The fact is the plant should 17 standards are met. 18 start at some point and will have its own problem. It would be different if -- from the Unit 1. It will 19 different because it will 20 be have a certain 21 commitment in the short-term to inspect the monitor 22 as the plant comes up and, in fact, because not 23 everything has been changed. 24 So therefore, you are going to monitor **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1 different formats of components and, you know, from a maintenance and point, too, for some time to make 2 3 sure it performs as expected. And hopefully it will. 4 But I'm saying that so there are going to be 5 differences in the programs between Unit 1 and Unit 2 for a period of time. After a period of time, you 6 7 may merge them together because you find that they 8 But -- so there are going to be some are singular. 9 differences there. And that may also spill over in 10 licensing commitments, which may be different. 11 CHAIR RAY: Well, and perhaps, Mario, you 12 have defined the area that we need to try and focus our thinking on, I guess, but we are groping here, so 13 14 we apologize. You wanted to comment, Rag, and then 15 Charlie. 16 MR. RAGHAVAN: Yeah. We were exactly

17 groping on the same issue as to what is it that we 18 would want ACRS to comment on on this particular 19 approach. What we were hoping to do is this is our 20 biq time approach. This is the way are we 21 establishing implementing the SRM. And this is what 22 we have done so far. And we wanted to establish as a baseline with which we can start. 23

CHAIR RAY: Okay. But then when we ask

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about the things that we have been asking about, the answer can't be well, we have set out the requirements, TVA has to comply with them and if they don't, we will have to approve an exception. I mean, because we know that. Charlie?

MEMBER BROWN: Yeah, it just -- when I 6 7 first started looking at this stuff, okay, to come to 8 the meeting and I was groping what, you know, are we 9 And the comment on initial conditions, my doing. 10 first thought when I started looking at this was, and 11 Т can't divorce the physical part from the programmatic quite as easily as maybe I should, but 12 13 the point being without -- there are some parts in 14 here, some components, some system, some structures which when you exercise these corrective action 15 programs and you go do stuff, they are already 25 16 years-old or 30 years-old. 17

18 They have been in since 1980 or '81 or 19 '82 or '83.

MEMBER SIEBER: '82.

21 MEMBER BROWN: What are those that 22 require the different thought process in terms of 23 applying a corrective action program? I agree, 24 tungsten motors, people go run those, they redo

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insulation systems, but cables, the stress on supports? Well, they -- you know, what happens when stuff is just like sitting there? Like now when this plant gets licensed and it finishes a 40 year cycle, when it comes up for renewal for another 20 years or something, it will already have 65 or 70 years of time in service, whether it is static or dynamic maybe is irrelevant in some cases.

9 And that was my concern relative to those 10 What are we missing when we look at these parts. 11 programs and what is going on from that time aspect? 12 Even though you can say well, we're not stressing It's not pressurized. 13 it. They are not running. Therefore nothing has happened. I don't think that's 14 15 really the case in all circumstances.

16 I don't know what the answers are, but I think that's what I was looking for relative to how 17 18 do we put the Betty Crocker/Good Housekeeping Seal of 19 Approval on, or thought process anyway, how we are 20 qoinq forward? And that was my thought process. 21 It's kind of -- it tones in with what are we missing? 22 CHAIR RAY: After the break, the 23 applicant will come and answer all of our questions, 24 I know. Is there any other questions for the staff,

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1	at this time? They will be coming back this
2	afternoon along with the region.
3	MEMBER MAYNARD: Not for the staff, but,
4	you know, I think we are going to need to let the
5	other we need to get through the presentations.
6	And I think at the end we will have to discuss that,
7	what do we think we need for the next step or
8	whatever. I think we are bantering this around quite
9	a bit and I think if
10	CHAIR RAY: But we're staying on
11	schedule, Otto. We are trying to make sure we do the
12	issues.
13	MEMBER MAYNARD: I mean to save some time
14	at the end for us to discuss what
15	CHAIR RAY: We will.
16	MEMBER MAYNARD: I don't think our input
17	really is that important for this Supplement 21. I
18	think it's more in the other areas that we have been
19	talking about.
20	CHAIR RAY: All right. Is there anything
21	more that you guys would like to say, at this time?
22	Okay. We will take a break until 10:45.
23	(Whereupon, at 10:24 a.m. a recess until
24	10:43 a.m.)
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CHAIR RAY: Okay. We will resume, please, and we will now be privileged to hear from the applicant. Before I turn -- something sounds like it is tapping on one of the speakers. I'm looking around here trying to figure out what it is.

Anyway, before I turn it over to the applicant, based on a hallway conversation, let me maybe give yet another example in our effort to illustrate what we are trying to grapple with here.

10 Imagine that if one were going to say, as 11 you may well say, we're going to take all of the valve actuators and refurbish them and eliminate 12 thereby any legacy from this long period of lay-up. 13 That would present, in my mind, a need for a program 14 15 perhaps that didn't exist at Unit 1 to ensure, for 16 that you didn't example, introduce some harsh 17 qualification environment weakness in the 18 refurbishment process, because presumably the OEM isn't going to take the things back and use them. 19

It wasn't needed in the case of Unit 1, because refurbishment wasn't, I'm hypothesizing here, required at Unit 1, but now it is part of the Unit 2 program. Is it adequately addressed would be a question. Do we really know how to do that without

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creating a problem?

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2	Now, I use that as an illustration just
3	to the kind of thing that we are trying to grope
4	with. It's not so much a question are you going to
5	do it, although some may want to be sure that, in
6	fact, it will be done in cases where it should be,
7	but well, all right, fine. But now given that we
8	are going to do it, isn't that something new that we
9	have to think about are we going to do it and not
10	create a problem as a result of what we have
11	undertaken to do?
12	I offer that to you just as food for

MR. BAJESTANI: Appreciate that. 14 Good 15 morning. My name is Masoud Bajestani. I'm the Vice 16 President for Watts Bar Project Unit 2. I appreciate 17 the opportunity to come to you -- to come here and talk to you about the completion of Watts Bar Unit 2. 18 to go through the introduction and 19 I'm qoing 20 introduce our team here.

thought. With that, please, Mr. Bajestani, proceed.

Zack Rad is our licensing supervisor; Ed Freeman our engineering manager; Gordon Arent is our licensing manager; Frank Koontz, mechanical nuclear specialist; Bill Crouch, our lead mechanical manager;

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Steve Hilmes, he is our electrical and I&C manager; David Osborne, he is our lead civil engineer, civil manager; Mark Marsher, he is our Westinghouse project manager; Steve Smith, he is -- he has got actually active SRO, Senior Reactor Operator, at Unit 1, but he is also interfaced between Unit 1 and Unit 2; and Bob Moll, he is also our pre-op starter manager.

8 With that, let me just explain a little 9 bit about the team that we have. We, essentially, 10 transferred the team that we had at Browns Ferry, the 11 TVA Management Team, to Watts Bar. The majority of 12 our team members, they either had experience at Watts Browns Ferry with extensive experience 13 Bar in or 14 construction, engineering and start-up testing.

And you know, I was planning to actually go through the study, but I would like to go ahead and try to address some of the questions that you brought up during the discussion.

CHAIR RAY: As you wish.

20 MR. BAJESTANI: Okay. Let me start by 21 talking about the lay-up, which was one of the main 22 topic in the discussion that we had. We, at Watts 23 Bar Unit 2 do not take credit actually for the long 24 lay-up. Whatever we have done, we disregard. What

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we are doing actually, we going like we have to establish the qualified lay-up. We have to establish essentially refurbished -- the equipment components to bring it to the original condition that we had back 30 years ago.

And why we are doing that is actually 6 7 what we have is, we call it, master equipment list. 8 Master equipment list actually is a list that has got 9 almost 66,000 unique IDs, essentially, a tag number 10 for every component, every piece of equipment that we 11 have. What we have to do as we go through this 12 refurbishment process, every component, valves, motors, thermocouples, transmitters, we go through 13 that and there is a decision tree that tells us, 14 15 essentially, how we are going to figure -- do a 16 complete replacement, partial replacement, refurbishment or establish -- actually, we have the 17 18 process for EQ, which we have to establish qualified life. 19

And so we have some equipment actually that can end up with a limited qualified life when we get the licensing. So that is the process that we are going to go through and, essentially, refurbish all the components.

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1 MEMBER SIEBER: Are you --2 MR. BAJESTANI: We are not taking credit 3 for, again, the lay-up. Every piece of equipment we 4 are going to go through a decision tree. It is going 5 to say, basically, replace it, partial replacement or 6 refurbish. Like I'm going to give you some examples. 7 MEMBER SIEBER: Okay. 8 MR. BAJESTANI: Go ahead. 9 MEMBER SIEBER: Are going to you 10 determine the extent to which qualified life is 11 limited due to the fact that construction was 12 suspended? Are you going to do that by analysis? 13 MR. BAJESTANI: Yes. Some equipment when 14 we go through the calculations like cables 15 specifically --16 MEMBER SIEBER: Right. 17 MR. BAJESTANI: -- when we go through the calculations, it will establish some limited life. 18 19 So there is a process actually that is going to establish the qualified life. It is actually looking 20 at, I'm going to use again, the cable. 21 The cable 22 we're going to look at it. It has been sitting over 23 there for 30 years and in temperatures it has been 24 sitting in somewhere between 75 to 80 degree or **NEAL R. GROSS** 

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higher. We're going to actually use that temperature for that period of time and we'll go look at the remaining life. Essentially, go through the calculations and say okay, here is what is left.

MEMBER SIEBER: Um-hum. Well, let me ask another question that's sort of off the subject, it will help me. We're going to go and visit you, I think, this summer.

MR. BAJESTANI: Right, yeah.

10 MEMBER SIEBER: And when we do, I would 11 like to look at Unit 2 probably more than Unit 1. can tell 12 if about roughly But you me percent completed of the plant, first. 13 Secondly, is the reactor coolant system fully installed by now? 14 And 15 was it laid up with nitrogen or something like that? 16 Third, commodities that aren't installed, for 17 example, I came from a unit that was delayed for a 18 period of time. We had a lot of medium voltage 19 cables stored in the yard outside, which is not the best place in the northeast to store stuff, so we 20 21 ended up warehousing a lot of that stuff.

So commodities that you have that are not installed yet, what are the physical -- how much is it? What is it? And what are the physical

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circumstances under which it was stored? That would help me understand the kinds of problems that you are facing. You can give me short answers for those things.

MR. BAJESTANI: Sure. Let me start by answering the question on the percent completed.

MEMBER SIEBER: Okay.

8 MR. BAJESTANI: Percent completion. When 9 we actually finished -- back in '85 when we stopped 10 the construction at one time it was about over 80 11 percent complete, over 80 percent complete.

MEMBER SIEBER: Okay.

13 MR. BAJESTANI: But because of all the work that we have done on Unit 1 to bring Unit 1 to 14 15 meet certain standards or requirements, if I -- if you add all that work that we have done on Unit 1 and 16 what we have to do to complete this project, we are 17 18 literally over 65 percent complete. Somewhere around 19 65 percent.

20 MEMBER SIEBER: Okay. I know that in a 21 couple of situations where licensees either canceled 22 or discontinued construction of the plant that they 23 used. The plant that they discontinued as a spare 24 parts warehouse --

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104 MR. BAJESTANI: Right. 1 2 MEMBER SIEBER: -- for the plants that 3 were operating. Did you do that and to what extent 4 did you do it? Borrow things from Unit 2 to put in 5 Unit 1. MR. BAJESTANI: lot of 6 There are a 7 equipment that was borrowed from Unit 2 and was 8 installed either at Watts Bar Unit 1 or Sequoia Unit 9 1 and 2. 10 MEMBER SIEBER: Okay. 11 MR. BAJESTANI: So the parts were 12 borrowed from Watts Bar Unit 2. Like I said, it was used for the other three units that are identical to 13 14 essentially what we have. There are a lot of 15 And I give you some examples. All 40 equipment. 16 active cooling pumps are not there. We've got --17 MEMBER SIEBER: Motors or the pumps? MR. BAJESTANI: The pump itself. 18 19 MEMBER SIEBER: Wow. So your reactor coolant system is broken, it's open? 20 21 CHAIR RAY: You mean the volute is gone? 22 MEMBER SIEBER: Yes, the pump. 23 MR. BAJESTANI: Actually the pump itself 24 is gone. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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105 MEMBER SIEBER: Well, everything is gone. 1 2 MR. BAJESTANI: Yeah. The rotating 3 element. 4 CHAIR RAY: All right. But the volute is 5 still in the --6 MR. BAJESTANI: Yeah, yeah. The bowl is there, yes. 7 8 CHAIR RAY: The bowl. 9 MEMBER SIEBER: Oh, okay. 10 MR. BAJESTANI: Yes. 11 MEMBER SIEBER: Yes, that's part of the 12 pump. Exactly. The rotating 13 MR. BAJESTANI: 14 elements are gone. 15 MEMBER SIEBER: Okay. 16 MR. BAJESTANI: We have --17 MEMBER SIEBER: So did you put something 18 over it? 19 MR. BAJESTANI: Yes, yes. 20 MEMBER SIEBER: Per shot? 21 MR. BAJESTANI: But we did not lay it up 22 with nitrogen. 23 MEMBER SIEBER: Okay. Steam generators 24 are installed? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

106 BAJESTANI: 1 MR. Steam generators are 2 installed. 3 MEMBER SIEBER: They don't meet up in any 4 way? 5 MR. BAJESTANI: We did not, again, have a 6 nitrogen blanket on that, but what we did on steam 7 generator is we actually went ahead and did 8 inspection on all four steam generators. We did a 25 9 percent element testing. 10 MEMBER SIEBER: Okay. 11 MR. BAJESTANI: And they all came up in 12 tip top shape. 13 MEMBER SIEBER: Okay. 14 MR. BAJESTANI: No issues. 15 MEMBER SIEBER: That doesn't account for the chemical contaminations of the generators being 16 17 open for years. 18 MR. BAJESTANI: Right. But --19 MEMBER SIEBER: What model generators are 20 they? 21 MR. BAJESTANI: It's D3. 22 MEMBER SIEBER: Okay. 23 MR. BAJESTANI: D3. 24 MEMBER SIEBER: Okay. Is that the one **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

107 1 with the pre-heaters? MR. BAJESTANI: Yes. 2 3 MEMBER SIEBER: Okay. Okay. 4 MR. BAJESTANI: Did I answer some of your 5 questions or do I need to explain that? SIEBER: We're getting there. 6 MEMBER 7 What about commodities that you have stored and not 8 installed? 9 MR. BAJESTANI: Okay. We have --10 MEMBER SIEBER: That could be cable, that 11 could be -- probably not concrete, but supports, 12 structural members. 13 MR. BAJESTANI: Okay. 14 MEMBER SIEBER: Instrumentation. 15 MR. BAJESTANI: Let me give you an example on instrumentation. All the transmitters 16 17 actually, safety transmitters, we're going to replace 18 them. 19 MEMBER SIEBER: Okay. 20 After we looked at it, MR. BAJESTANI: 21 refurbishing transmitters versus replacing it and the 22 cost benefit, we just decided to go ahead and replace 23 them. MEMBER SIEBER: Right, yeah. 24 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

MR. BAJESTANI: Commodities like cables, 1 2 all the cables are installed. They are not outside. 3 They are not stored outside. 4 MEMBER SIEBER: Okay. Is the building --5 are the buildings heated or --MR. BAJESTANI: The container is actually 6 7 essential, because it is closed, so it is -- you 8 know, but as far as heated, it's not that we actually 9 heated the container, no. 10 Okay. MEMBER SIEBER: But it is not a 11 cold water plant. 12 MR. BAJESTANI: No, it's not. 13 MEMBER SIEBER: Okay. The other thing we did 14 MR. BAJESTANI: 15 followed this -- our inspection program. We actually put about 100 engineers, right at the beginning 16 before we actually start this project, to mark down 17 18 every piece of equipment. 19 MEMBER SIEBER: Okay. 20 MR. BAJESTANI: And look at the condition 21 of the equipment and tell us what it is before we 22 actually make a decision and make a recommendation to TVA board of directors that we want to go ahead and 23 24 complete this project. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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109 SIEBER: Okay. 1 MEMBER So you have 2 records of all that? 3 MR. BAJESTANI: Yes. 4 MEMBER SIEBER: And they are by marked 5 number, MEL list? BAJESTANI: The MEL? The master 6 MR. 7 equipment list, it's, like I said, about 66,000. 8 MEMBER SIEBER: You could --9 MR. BAJESTANI: You can actually go from 10 one to another, exactly. That should make 11 MEMBER SIEBER: Okay. 12 tracking down what you have done and where you have to go easier. 13 14 MR. BAJESTANI: Exactly, exactly. 15 MEMBER SIEBER: Did you use pull tickets when you pulled cables? Do you actually know where 16 17 the cables go? 18 MR. BAJESTANI: Yes. We actually had to-19 - well, we used to have, we call it, I-card actually, which specifically says here is the cable. It was 20 21 pulled from here to here. And this information was 22 submitted to engineering for their voltage drop calculations and all this other stuff, you know. 23 24 MEMBER SIEBER: Right. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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MR. BAJESTANI: So we have actually been able, Steve Hilmes has actually -- he is in Electrical I&C. Do you want to talk about the cable pull?

5 MR. HILMES: Yeah. Steve Hilmes, 6 Electrical I&C. Essentially, we have gone back in 7 all the safety-related cables. We have a -- pretty 8 much we have found all the pull records on them. 9 There is a few where we have a computer database, but 10 we went back and we actually physically pulled the 11 paper pull records on them and we are -- yes, sir? 12 MEMBER SIEBER: Do you ever match it with tags or just look at the records? 13 MR. HILMES: We are looking at the record 14 15 and if we can get to, we are validating every cable 16 that is in the plant that it is installed. In the case of Class 1E cables, we are documenting anything

17 case of Class 1E cables, we are documenting anything 18 that we can off the jacket. Again, some places it's 19 impossible to get that data. In that case, we will -20 - we are relying on the pull record.

## MEMBER SIEBER: Okay.

22 MR. BAJESTANI: Also, there was a 23 question that came up during the discussion on 24 documentation, whether or not we are finding all the

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documents that we need for Watts Bar Unit 2. So far every document that we have been looking for, we have been able to find. As a matter of fact, we had to go through extensive preparation for ASME survey, Section 3, and Bill Crouch is our mechanical lead engineer, he can tell you how many feet of cable. Go head, Bill.

MR. CROUCH: Thanks for helping me.

9 MR. BAJESTANI: I mean documents, 10 documents.

11 MR. CROUCH: Bill Crouch. T'm the 12 Mechanical Nuclear Manager for Watts Bar Unit 2. As part of going through the effort of verifying what 13 all we had out there in the plant, we have a two-step 14 15 process where we, TVA, are going and verifying all the work that was installed back in the '80s and 16 pulling all the weld records, the weld operation 17 18 sheets, etcetera.

We have been able to find every piece of 19 it, either through our electronic media or through 20 21 our hard copy vault. We have pulled all the CMTRs, 22 all the MPB1 forms, NPB1 forms, weld records, 23 etcetera, through the -- all the plaquing that was 24 installed is being assembled into the, what's called,

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112 1 ASME N5 package. It is broken up by a system or 2 portions of systems. And when you stack all this 3 paper up together, it's going to be about 115 feet 4 thick of paper to document just the welds in the 5 plant. 6 MEMBER SIEBER: I know what the -- how 7 many trailer trucks --8 MR. CROUCH: Yes. 9 MEMBER SIEBER: -- you will need to haul 10 it. Let me ask you this. Was TVA the architect 11 engineer that you have now? 12 MR. CROUCH: We were the architect engineer. 13 14 MEMBER SIEBER: So you've got the 15 records? 16 MR. CROUCH: Yes, we have everything. 17 MEMBER SIEBER: Plus outside people who -18 19 MR. CROUCH: Yes. 20 MEMBER SIEBER: -- would like to show you 21 the records. 22 MR. CROUCH: No, we have it all in our 23 own vaults, either electronic or hard copy. 24 MEMBER SIEBER: Okay. Okay. That's **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

enough detail for me to understand where you are.

MEMBER STETKAR: Let me just ask one question to follow-up just a bit on Jack. What are you doing about buried piping? Everything you mentioned is equipment list and things that I can walk up to and pretty much touch in the plant. What are you doing about buried piping?

8 MR. BAJESTANI: Buried piping really -- a 9 couple of systems that we have buried piping and, 10 Frank, you want to address that?

11 MR. KOONTZ: Yes, Frank Koontz. I'm an 12 engineering specialist at Watts Bar. Most of the 13 buried piping that we have at the plant is either 14 associated with Unit 1 or a common system.

MEMBER SIEBER: Right.

16 MR. KOONTZ: So a lot of that equipment is under control of Unit 1. 17 It's also in the 18 maintenance rule program. It consists of our 19 essential raw cooling water piping or raw service water piping, high-pressure fire protection piping. 20 21 And so a lot of that piping has been maintained over 22 the years. That's not to say that we haven't had 23 some leaks that have been repaired. We dig them up 24 and repair them, you know.

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MEMBER SIEBER: Part of the --1 MR. KOONTZ: And the essential raw --2 3 MEMBER SIEBER: You have parts of the 4 service water though that probably have not been 5 filled except perhaps inadvertently for leakage and what have you. 6 7 MR. KOONTZ: There may be some raw 8 service water piping that has not been used. The 9 essential raw cooling water system was turned over in 10 its entirety. We have 8 pumps down at the intake 11 pumping station, 4 headers, all of that piping was 12 turned over to Unit 1 as part of the plant turnover. 13 MEMBER SIEBER: Good move. 14 MR. KOONTZ: Yeah. So --15 MR. BAJESTANI: Essentially, the answer is for Unit 2, we really don't have buried piping 16 that we've got to do something about. 17 MEMBER STETKAR: Yeah, we'll talk to 18 19 this. I have some questions about --20 MR. BAJESTANI: Sure. 21 MEMBER STETKAR: -- shared systems. 22 MR. BAJESTANI: Sure. 23 But I think you have MEMBER STETKAR: 24 my concern. Essentially, what you answered are **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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115 1 saying is that you don't believe that there are any unique Unit 2 buried piping systems that --2 3 MR. BAJESTANI: That's correct. 4 MEMBER STETKAR: -- haven't been managed 5 as part of the unit. MR. BAJESTANI: Right, that's correct. 6 7 MEMBER MAYNARD: The other thing I would 8 add into that is to make sure -- do you have any dead 9 legs or anything? I mean, it may be water in or it 10 may be active, but if you have a dead leg, you create 11 a problem there. 12 MEMBER SIEBER: Yeah. MR. BAJESTANI: Well, let me explain from 13 14 this and I guess we have again pre-op starter manager 15 He can expand on that. We have found some here. 16 special underground cooling water that we have had some dead leg and we have had some leakage from Unit 17 1 to Unit 2 and we did find some issues and we are 18 19 actually going through those piping, this assembly, and actually hydrolasing or replacing as needed. 20 21 MEMBER SIEBER: Dead legs aren't all that 22 bad because if you have a dead leg, there is oxygen in whatever water is in there. 23 24 MR. BAJESTANI: Right. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	MEMBER SIEBER: It corrodes a little bit.
2	MR. BAJESTANI: That's right.
3	MEMBER SIEBER: The oxygen disappears and
4	then all you have is an interface.
5	MR. BAJESTANI: That's exactly why we are
6	hydrolasing some of the piping and cleaning it up,
7	you know.
8	MEMBER SIEBER: That's right.
9	CHAIR RAY: Okay. Let's proceed.
10	MR. BAJESTANI: Okay. A couple of other
11	issues that came up, let me just go right into and
12	also try to address that. Some operational issues,
13	how we are addressing some of issues on Unit 1 that
14	we have problem and how we are taking care of it in
15	Unit 2, I think, you asked that question.
16	As we go through the completion of Watts
17	Bar Unit 2, there are issues that we know that exists
18	on Unit 1 and we are actually taking care of it. And
19	I'm going to provide some examples, so you know what
20	it is.
21	Low-pressure turbine. All three low-
22	pressure turbines, they are designed actually for
23	certain back-pressure. Every summer right now, Unit
24	1 actually de-rates because of the back-pressure
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issue. And we have had actually low-pressure, the last stage which is low-pressure, Charlie. We have had weight that actually damaged because of the highback pressure.

MEMBER MAYNARD: My concern would not be so much on that, as much as let's take like let-down heat exchanger. The things that may have been a problem operating-wise that once you are rated, you know, that's a high-dose job to go down and do any repairs or modification to let-down or excess letdown heat exchange.

## MR. BAJESTANI: Right.

Most of the problem the 13 MEMBER MAYNARD: 14 industry had was really more to misoperation in the 15 early life of the plant. But there have been 16 problems with let-down heat. Anything like that that you have experienced that would be very difficult or 17 18 a high-dose job to modify later would be an ideal 19 time now to take a look at that.

20 MR. BAJESTANI: We have a list of 21 actually things that are -- our corporate engineering 22 actually looked at it, they have provided that list 23 to us to take a look at it now, specifically for dose 24 reduction, which we're going through evaluating one

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by one and see what we're going to do different.

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But also, besides the dose reduction, 2 3 there are other operational issues that we are, essentially, fixing on Unit 2, so we don't have the 4 5 same problem. I'll give you an example on the 6 pressurizer pressure control. We've qot the 7 redundancy on the two right now, but it's manual, so 8 if we lose one channel, one sensor, operator has to 9 actually manually take control of the pressurizer 10 pressure control.

The new system, digital system that we put in is actually automatically is going to do that. So there are some operational issues that we are addressing as we go through this project.

15MEMBER SIEBER:I apologize for16interrupting.

MR. BAJESTANI: Sure, no problem.

18 CHAIR RAY: Masoud, are there any other19 things you wanted to address up front?

20 MR. BAJESTANI: Let me see if I -- no, I 21 think I can -- if I go through the rest of the 22 presentation perhaps we can address.

23CHAIR RAY: All right. Fine. Now, we24are going to, at some point here, I guess, get to the

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review of the licensing phases, according to the agenda anyway. Then we will come back to you and talk about construction reactivation and so on, at least that's what I have on my sheet.

MR. BAJESTANI: Okay. Well, then go ahead.

7 CHAIR RAY: Okay. When we do that 8 though, I just want you to note I would like to visit 9 the question of turnover of responsibility to the 10 extent it has occurred from TVA Engineering to any 11 other contractors. In other words, the question was answered who was the AE before, it's TVA. 12 Is that 13 changed now in any way? And if so, how?

14 MR. BAJESTANI: And we can explain that. 15 that through his Ed can explain as he goes 16 presentation. But I do want to make sure that -- I know we have future meetings and some of you guys 17 18 want to visit Watts Bar, I quess, in July. Any 19 follow-up, any questions that comes up from here or any other special topics that you want us to address 20 21 and we can't address it here, at this point, we're 22 going to make sure that we address it in future 23 meetings.

CHAIR RAY: Well, thank you. We will

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1 look forward to that. We are, as you have heard us say many times, struggling though with whether we 2 3 have enough information and there is a need for us to 4 write a letter and we're kind of focused on that 5 right now. 6 MEMBER BROWN: Can I also interject? 7 CHAIR RAY: Charlie? 8 I'm going to screw this MEMBER BROWN: 9 up, but you mentioned you are putting in a new 10 digital I&C system. You have put the word new in 11 front of those--12 MR. BAJESTANI: Yes. 13 MEMBER BROWN: -- words. So I take it 14 it's going to be different from the Watts Bar Unit 1? 15 MR. BAJESTANI: Yep. 16 MEMBER BROWN: I&C system. MR. BAJESTANI: It will. 17 18 MEMBER BROWN: And is -- that's -- there 19 is some interest --20 MR. BAJESTANI: We're going to address 21 this. 22 MEMBER BROWN: -- in those systems and if it is -- and I don't know, I just wanted to know did 23 24 understand that correctly? And will that be Ι **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

1 separately evaluated relative to -- you don't have to answer this now. We've got a lot of other stuff at a 2 3 higher level to go through, but --4 MR. BAJESTANI: We can address that now, 5 if you want us to do that. BROWN: Is it previously 6 MEMBER 7 qualified? 8 MR. BAJESTANI: Steve? 9 CHAIR RAY: Go ahead, Steve. Steve Hilmes, Electrical 10 MR. HILMES: 11 I&C. Our safety-related I&C systems are a duplicate 12 of Unit 1, as far as SSPS, our Eagle 21 system. There is a RVLIS system, monitoring system that will 13 be -- have some differences in it. 14 It's a newer 15 platform. And we have a -- we are going to fixed in-16 core probe system. Okay. Those are on the interplus more side. 17 18 The -- as far as what he was talking 19 about a pressurizer control, that's the non-safetyrelated control. Okay. And so what we are having to 20 21 do here is there are portions that Unit 1 will 22 actually have installed prior to Unit 2 coming up, 23 okay. And what we are doing is we are trying to make 24 the systems as close as possible from the operator

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1 standpoint for that non-safety-related control stuff. But there will be differences, slight differences we 2 3 are evaluating them case-by-case with operations. 4 CHAIR RAY: Okay. That's -- I just 5 wanted to make sure it gets brought in, so that those things which are different --6 7 MR. BAJESTANI: Yes. 8 -- or changes will be with CHAIR RAY: 9 sufficient detail. I emphasize that strongly. 10 MR. BAJESTANI: Sure. Sufficient detail to allow 11 CHAIR RAY: 12 both the staff and any key facts or other 13 presentations they have for us to cover those areas. 14 That's all. I mean, I thought I read in some of the 15 papers about it was going to be the same. You said 16 You're saying it's really the same except for a new. couple of other pieces. 17 18 MR. BAJESTANI: Right. 19 CHAIR RAY: So we can stop there. 20 MR. BAJESTANI: Exactly. 21 CHAIR RAY: Okay. 22 MR. ARENT: All right. My name is Gordon Arent. 23 I'm the licensing manager for Watts Bar Unit 24 2. I had a fairly lengthy discussion on, I guess, **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

the history behind the licensing of Watts Bar Unit 1 and kind of the overall TVA fleet. I don't want to repeat a lot of what Pat talked about, so I do want to touch on a couple of specific topics. And then I want to go into some detail about how we actually built the tables that you now see in SSER-21 and the process that TVA went through to develop those to maybe answer some of the questions that we heard this morning.

10 So in 1985, of course, TVA had shutdown 11 its Sequoia and Browns Ferry plants and suspended 12 construction on Watts Bar units. And in 1988, as a 13 result of that, we developed the NPP or the Nuclear 14 Performance Plan for Watts Bar Unit 2 over the Watts 15 Bar site for recovery of that site.

16 The key attributes to that plan were 17 strengthening the management organization of Watts 18 Bar, management control and involvement at our 19 Employee Concerns Programs and how had we not effectively used those previously, the resolution of 20 21 CAP and Special Programs, which we will talk about in 22 some detail in a few minutes and then operational 23 readiness for bringing the plant on-line. And we started that in the 1988 time frame. 24

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In parallel with the work that we were doing on Watts Bar Unit 1, we did recover the Sequoia units in 1988. We recovered Browns Ferry Unit 3 --I'm sorry, Unit 2 in 1991. And then moved on to the Browns Ferry Unit 3 unit in the '91 through '95 time frame.

7 Next slide, Zack. By 1995, we had 8 developed and gotten ourselves in the position to 9 again request an operating license for Watts Bar Unit 10 1. In Amendment 91 to the Final Safety Analysis 11 report, was that license. We have talked about it a 12 little bit, there were some significant systems that were turned over at the time that Watts Bar Unit 1 13 was licensed that were Unit 2 systems. 14

Emergency raw cooling water was one of those systems, emergency diesel generators was another one of those systems. So there has been some turnover of safety-related systems and those have been maintained under the maintenance rule since that time frame.

## MEMBER SIEBER: Okay.

22 MR. ARENT: In 2000, Watts Bar was 23 officially declared in deferred plant status. And 24 how that occurred was in 1999, we came in for a

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construction permit extension for Watts Bar Unit 2. And a request for additional information was asked as to whether or not that plant was actually in the policy statement deferred status. And at that time, we said that we were officially in deferred status for Watts Bar Unit 2.

That does not preclude the fact, however, that when we suspended operation on Watts Bar, that we did put system in lay-up, and Ed Freeman will talk about that later today, beginning in 1985. And he will talk through the sequence of how that occurred.

12 2002 2007, Between and we actually recovered Browns Ferry Unit 1. 13 And we will talk at some length, Mr. Bajestani will talk in some length, 14 15 about lessons learned from that experience and the team that was involved in that. 16

And then once we got Watts -- or once we got Browns Ferry Unit 1 back on-line, we did come in for the key assumptions in our approach to completing the construction project at Watts Bar Unit 2.

So in April of that year, 2007, we came in with a key assumptions letter that basically had two key assumptions. First, that we wanted to complete construction under 10 CFR Part 50 and not

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1 under Part 52. And then the second item was that we wanted to utilize the Unit 1 licensing basis, which 2 we talked about in some detail already this morning. 3 MEMBER SIEBER: Do you have the licensing 4 5 basis clearly developed? MR. ARENT: For Watts Bar Unit 1? 6 7 MEMBER SIEBER: For Unit 2. 8 MR. ARENT: Actually, SSER 21 does Yes. 9 clearly define what the licensing basis for Watts Bar Unit 2 is. 10 11 MEMBER SIEBER: Okay. Does the staff 12 agree with that? 13 MR. RAGHAVAN: Yes. 14 MEMBER SIEBER: Okay. 15 MR. ARENT: Okay. And when we get to the next slide, I want to talk a little bit about what 16 17 resolved means, because there were some questions 18 this morning earlier on about what resolve means. 19 And I'll tell you what resolve means from the TVA perspective and we'll go from there. 20 21 MEMBER SIEBER: Okay. 22 MR. ARENT: And then again, Pat talked 23 about the SECY-07-096 that basically set the 24 guidelines for how going we were to go about **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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127 1 licensing Watts Bar Unit 2 in a very broad picture. 2 So we'll move on. 3 CHAIR RAY: You mentioned the essential 4 raw cooling water --5 MR. ARENT: Essential raw cooling water 6 system? 7 CHAIR RAY: -- having been turned over to 8 Unit 1. 9 MR. ARENT: Um-hum. 10 At what point will be talk CHAIR RAY: 11 about the effect of that now supplying both units? MR. ARENT: We can talk about that now. 12 Bill? 13 14 MR. CROUCH: Yeah. 15 MR. ARENT: Bill Crouch, who is our lead mechanical, can speak to that. 16 17 CHAIR RAY: Hum? 18 MEMBER STETKAR: Let's wait until this 19 afternoon when we talk about it, because I have 20 several questions. 21 CHAIR RAY: Yeah. I just want to know 22 when we're going to do it., 23 This might drag MEMBER STETKAR: on 24 longer if we want to get them through the licensing **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	basis.
2	CHAIR RAY: Okay.
3	MEMBER SIEBER: Yes. I was just
4	MEMBER STETKAR: Just the issue this
5	morning.
6	CHAIR RAY: All right. Well
7	MEMBER SIEBER: Make us wait.
8	CHAIR RAY: It came up in the context, in
9	my mind, of the licensing basis, but in any event,
10	that's all right.
11	MR. BAJESTANI: We'll address it.
12	CHAIR RAY: We'll do it later.
13	MR. ARENT: We will take a note to make
14	sure that we do that. SSER 21, which was the
15	development, basically, the Watts Bar Unit 2,
16	licensing basis, the way that we at TVA developed
17	that was that we took the SERs that had been
18	developed for Watts Bar Unit 1 and again, SERs from
19	No. 1 through No. 4 were basically for both units in
20	all cases.
21	SER SSER 5 through 20, for the most
22	part, did address both units. There were probably
23	all in all about close to 70 percent of all of the
24	SSERs that we looked at addressed both units. And
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what we did was we went back and said did the approach to how that was resolved on Unit 1, was that approach approved for Unit 2?

The engineering process you were going to use, the design process you were going to use, were those approved for Unit 2? And what we found in those SSERs was yes, they were in 70 percent of the cases.

9 The other thing that we looked at was 10 what do we consciously know that we are going to 11 change today? So as an example, Steve talked a 12 little bit about the fact that we were going to change our I&C processors. In SSER 21, you will find 13 14 that that line item is open. So anything that we 15 knew we were physically going to do different on Unit 16 2, we left open right from the front end, right from 17 the get-go.

18 The other thing that we looked at was 19 what has changed on Unit 1 from the time it was licensed in 1995 until today? 20 So we looked at 21 everything that was done under the 10 CFR 50.50 22 process or anything that we did that came in for a 23 tech spec amendment on. And we said okay, those 24 Those items are open in the SSER items are changes.

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So those were the major attributes that we looked at as we developed the front end part of those tables, the SSER part of the table. So there was a question this morning about did we prioritize? We did, in fact, look at the things that we knew we were going to change and made sure those were left open. And then we looked at things that we -- may change and left those open.

10 The final thing that we have done and 11 it's on the next slide, but I'll talk about it now is 12 have built, what we call, a Licensing Basis we Preservation Program. And it is a codified program 13 14 with checklists that requires design engineering, 15 when they develop a modification that is going to go into Unit 2, to look at the design and licensing 16 basis for that modification and ask the question, 17 does it alter what has previously been approved by 18 the staff in the SSER 21? 19

20 So that's the process that we have used 21 in developing the SSER. And that's how we got to the 22 first part of the SSER 21.

23 Generic letters and bulletins were 24 reviewed in a similar manner. Again, we took the

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approach that was used on Unit 1 and we said can we perform the same approach on Unit 2? In some cases, we couldn't because it has been overcome by time. You know, one has had to make two or three revisions to the way to approach the generic letter. We took the latest approach that was done on Unit 1, the last time that it was addressed.

In some cases, like the new generic letters that we have on high point vents, we are addressing those in parallel with Unit 1. But for historical things, we have looked at the latest version of the generic letter, generic communication and we addressed that issue in that manner.

14 CHAIR RAY: Well, there is a lot of open 15 items listed here. I don't want to --

## MR. ARENT: Um-hum.

17 CHAIR RAY: -- try going through them, 18 but from what you said, it sounds like where there is 19 an open item, it would reflect doing something Is that what you meant to say? 20 different. 21 MR. ARENT: Yes. So what we would have 22 to do is we would have to build --23 CHAIR RAY: Take flooding protection just

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because it's on the first page. Flooding protection,

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1	you are going to do something different or is that
2	just not resolved, because there is
3	MR. ARENT: There are some questions
4	CHAIR RAY: some questions that
5	haven't been answered?
6	MR. ARENT: that deal with flooding
7	and those evaluations will be done later this year.
8	And once those are done, then we will go back and
9	revisit what we currently have and we will be able to
10	submit and say that what was validated originally is
11	still correct or we have to make some changes and
12	submit those changes.
13	CHAIR RAY: Okay. Go ahead.
14	MR. ARENT: Okay. So getting back to the
15	generic communications. We have looked at all the
16	generic communication responses for Unit 1 and have
17	submitted those that were previously approved for
18	both units and also those that we know that we have
19	to provide initial responses for.
20	It is important to understand that on
21	things like generic communications and then when we
22	get into the corrective action and special programs,
23	that there is a whole secondary attribute that the
24	region will have to come in and inspect our

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So the front end that we are doing in SSER 21 right now is simply the design piece. Simply the NRR piece. And then Bob Haag and his folks will come out and do the inspection piece for how we actually implement the plan and validate that that is done prior to telling us we are ready for our license.

9 CHAIR RAY: So you would conclude from 10 that, I guess, that anything we would say, at this 11 point in time, would be just relevant to the 12 licensing basis in Part 21, since everything else is 13 perspective?

MR. ARENT: Correct. It's just saying that our approach to use Unit 1 or to say we've got we're coming up with something different is the appropriate thing, at this point.

CHAIR RAY: All right.

MR. ARENT: Okay. A corrective action program, Pat went into this in some detail, but I guess one of the things I wanted to talk about a little bit was there were some questions on cable tray supports. That was kind of one of the topic areas that we talked about earlier. And I want to

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give you a little bit more detail/background on what cable tray supports was about.

There were deficiencies found in the cable tray supports, and this is on Unit 1, that included things like inadequate tray connections, inconsistencies between as designed versus as built and some -- in some cases the orientation of the cable trays in the field.

9 What we did on Unit 1 was the following 10 items: We assured the structural adequacy and 11 compliance with the design on Unit 1 and we did a 12 review of the design. We reviewed the development of the design output, the calculations, the drawings, 13 whatever went into the design output with the design 14 15 criterion and ensured that they had been translated 16 correctly.

of 17 walked down all field We the 18 configurations and identified deviations from the 19 design output as well as any degradations that we found in the field from maybe someone running into a 20 21 cable tray or whatever the case might be. And then 22 we did modifications to the field conditions to bring 23 them to design basis.

And when we say we're going to take the

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same approaches on Unit 2 as we do on Unit 1, those five bullets that I just went through as to what we specifically did on Unit 1 will be done on Unit 2 today.

MEMBER STETKAR: Gordon, this may not be fair, but I'll ask it anyway.

MR. ARENT: That's okay.

8 MEMBER STETKAR: Because we don't have to 9 be fair, I guess. When you say that, for example, we 10 have learned a lot in the last 25 to 30 years about 11 seismology in the Tennessee region. We have learned 12 a lot about the effects of high-frequency ground 13 accelerations. When you say you are going to go back and reevaluate Unit 2, is it relative to what we know 14 today regarding seismic accelerations or 15 is it relative to the seismic licensing basis for Unit 1 30 16 17 years ago or more than 30 years ago?

18 MR. ARENT: I'll let Dave Osborne, he is19 our structural guy, respond to that.

20 MR. OSBORNE: Well, we have evaluated or 21 will evaluate the plant to the site-specific response 22 spectra. It was original. If you're not familiar 23 with it, there is original site response spectra, 24 which was the modified NUMARC and then there is a

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site-specific response spectra, which is an additional set, what we call Set B. The first one is Set A. The second is Set B.

4 Set В is the site-specific response 5 spectra and it is somewhat larger than the original. And we will evaluate everything on Unit 2 to this 6 7 new -- to the site-specific response spectra. And we 8 have made a commitment -- if we do modifications, 9 there is also a Set C. And Set C is the -- is a --10 the original response spectra that modified NUMARC 11 that has been updated to the latest techniques, 12 modeling techniques.

So what we have committed to when we do 13 modifications that we will modify anything to what we 14 15 call a B + C. And B + C is not directly additive, 16 but it is a curve that encompasses both the B and the So any modifications that we do -- and we also 17 С. 18 have committed to doing any attached piping to the 19 reactor coolant system to the B + C, which is a 20 larger spectra.

21 MEMBER STETKAR: Not quite knowing what 22 A, B and C is precisely, does the C have a high-23 frequency acceleration part?

MR. OSBORNE: We terminated ours. We

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terminated ours at 33 hertz.

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2 MEMBER STETKAR: Okay. So the answer is 3 no.

MR. OSBORNE: Thank you.

5 MEMBER SIEBER: Another quick question, 6 which I would prefer just be a yes or no. Does 7 anything you do in Unit 2 apply to Unit 1? 8 MR. OSBORNE: Ask that again. 9 MEMBER SIEBER: Yes or no? Anything you 10 find in Unit 2, as far as seismic, hangers and 11 supports, would it apply to Unit 1? Yes or no? 12 MR. BAJESTANI: That's a tough way to say Let me expand on that. 13 yes or no. CHAIR RAY: Well, wait a minute. I'm not 14 15 sure we want to get into the answer to that, because this is a public meeting and I'm not sure we want to 16 17 start asking questions about Unit 1. 18 MEMBER SIEBER: Okay. CHAIR RAY: Let's stick with Unit 2 19 operating license. 20 21 Probably the answer is MEMBER SIEBER: 22 no. 23 MR. Okay. Moving on with ARENT:

corrective action programs and special programs.

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When we reviewed the historical programs from Unit 1, we did use, in fact, the last approved revision to that program that usually occurred in the early '90s, so '91/92 time frame was our starting point for most of the CAP and special programs.

What we did then was we went and looked 6 7 at whether or not the 1991 or 1992 programs had been superseded by time. So we looked to see if there had 8 9 been new regulations that had come out, if there were lessons learned from Unit 1 that had come out. 10 And 11 we made sure that as we developed the fixes on Unit 12 2, that we applied those programs from Unit 1 and the lessons learned. 13

The other thing that we have done, and 14 15 now is probably the best time to bring this up is, we have developed, what we call, historical document 16 And one of the things that we were not were 17 review. 18 of based on the length of time between the time we 19 licensed Unit 1 and the time -- actually, we shutdown Unit 2, and the time that we are today is, did we 20 21 consistently capture all of the things, the lessons 22 learned, the broken pieces parts in the plant that we found on Unit 1 and did we duplicate that issue for 23 Unit 2? 24

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And we had no level of confidence that we had done that consistently from 1985 until today. So we put together a team of folks and we, basically, identified 43,000 documents that were historical inspection reports, historical correction action program write-ups, any other type of --

MR. BAJESTANI: Employee concerns.

MR. ARENT: -- employee concerns, any other type of item that we had out in the field and we are reviewing each of those 43,000 documents for applicability to Unit 1 or Unit 2. And most of those are closed Unit 1 items.

13 had, when we started the project, We about 500 open Unit 2 items. 14 And we looked at the 15 population of things we actually looked at at Unit 1 and said these can't be right. So we went back and 16 looked at all the closed Unit 1 stuff to make sure 17 18 that -- whether or not it was applicable to Unit 2. 19 And we have transferred, right as of today, about 68 percent of each document we have picked up has gone 20 over to Unit 2 for resolution. 21

22 So if that track record stays, we will 23 end up with about 26,000 items to address on Unit 2. 24 CHAIR RAY: That's part of your program?

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1 I mean, you described what you have been doing. 2 MR. ARENT: Yes. 3 CHAIR RAY: But it's --4 MR. ARENT: Yeah, that's a codified 5 program. CHAIR RAY: -- requirements so that the 6 7 NRC can follow-up? 8 Oh, yeah. In fact, they have MR. ARENT: 9 come out and inspected the initial phases of that 10 And the first phase of the program is program. 11 expected to be done here about the 1<sup>st</sup> of May. The next slide. 12 The licensing basis preservation, I have talked about that a little bit. 13 And again, that's to look at all the things that we 14 15 are currently doing from an engineering standpoint to make sure that we are not undoing something that has 16 currently been completed or at least our approach has 17 been considered resolved for Unit 2. 18 We have extended the construction permit 19 It was originally due up in December 2010. 20 to 2013. 21 And we expect that to be sufficient to allow us to 22 complete the project. We have submitted our final 23 Supplemental Environmental Impact Statement and that 24 was submitted originally last summer and then we did

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do a Severe Accident Mitigation Alternatives evaluation and that was completed in January. And that has also been submitted.

We have developed a draft. I'm sorry, we developed an actual Safety Analysis Report, Amendment 92, which is the baseline Unit 2 Safety Analysis Report. It reflects the fact that we now have a twounit station and it also reflects items that have been completed for common systems to date. And that was submitted to the staff.

And right now, the plan is as we continue with design and engineering, that we will do four submittals over the remainder of the year, one in April, one in August, one in November and then one at the end of the year. That will complete validation of the design basis of the plant.

Operation license application. 17 We have 18 done an update to the 1976 operating license. We 19 have developed a set of technical specifications for Watts Bar Unit 2 that is a template instead of 20 21 specifications that are based on the current Unit 1 22 specifications. It includes all the amendments that have been done to date. And we have worked with Unit 23 1 on making sure that our schedules are complementary 24

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to get us to a licensing standpoint.

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We have built a technical requirements 2 3 We have updated our emergency plan in draft manual. 4 form to include NUMARC-style emergency action levels 5 for Watts Bar Unit 2. We have completed security plan review and determined, first off, that the plan 6 7 is applicable to both units and that no plan changes 8 There are implementing procedure will be required. 9 changes that we will have to make, but the plan, as 10 it stands, is acceptable.

And of course, we are evaluating the new security plan for impacts on Watts Bar Unit 2. There are some areas that are clearly -- we have been exempted from as part of that new security plan or security rule, but there are other areas like cybersecurity that will apply to Unit 2.

And then finally as part of that report, we did provide a decommissioning report for Watts Bar Unit 2. And that's it.

20 CHAIR RAY: There is this somewhat 21 interesting admonition the Commission gave the staff 22 about encouraging you to adopt updated standards. 23 Can you give me any example of where you have been 24 encouraged to do that and have agreed to do it and to

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1 the contrary, where you thought it best not to? MR. ARENT: To date, the only one that we 2 3 have really addressed, at this point in time, has 4 been cybersecurity. As part of the new security 5 rule, the cybersecurity standard for what plants have 6 to have in place, we will adopt that. 7 MEMBER MAYNARD: Yes, but you are being 8 required to adopt that, aren't you? 9 MR. ARENT: Right. 10 MEMBER MAYNARD: Yeah, okay. I think you 11 were asking more on the voluntary basis. 12 CHAIR RAY: Yeah. Yeah, I just wondered 13 how that encouragement worked. MR. ARENT: To date, we have not actually 14 15 discussed in any detail any new standard that we 16 should consider applying. 17 CHAIR RAY: Um-hum. 18 MR. ARENT: So --19 MEMBER SIEBER: That's sort of а difficult question, because you almost have to change 20 your licensing. 21 22 MR. ARENT: Right, right. 23 MEMBER MAYNARD: That's right. 24 MR. ARENT: Exactly. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701

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144 MEMBER SIEBER: I'm not sure that that 1 2 would work out when you have most of the equipment already there installed. 3 4 MR. ARENT: Right. 5 MEMBER SIEBER: I'm sure the 6 Commissioners can say they wish you did. 7 MR. BAJESTANI: But, you know, as to the 8 cable issue that we had, the discussions that we had 9 with Electrical Branch, we did commit to use the latest IEEE standard for future installation of any 10 11 new cable. 12 MEMBER SIEBER: Right. I can understand that. 13 Well, okay. 14 CHAIR RAY: I guess I'm 15 still pondering all of these open items and wondering what the heck they represent, but this is not the 16 place to try and go through them. There is a lot of 17 18 open items listed in SSER 21. 19 MEMBER SIEBER: I sort of got the feeling that there has not been an analysis, but just a 20 21 retabulation of what has already happened at the 22 staff level. And that's what the NUREG seems to 23 represent is a status report of where the reviews 24 the time they were suspended. Is that were at **NEAL R. GROSS** 

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1 correct? MR. MILANO: Yes, it was. And with the 2 3 exception of what Mr. Arent said that when TVA 4 recognized that they were going to be doing something 5 different in an area which would cause that section 6 to be reopened, the staff accepted the fact that it 7 was -- that something that we would have considered to 8 be closed, based on the SSER and the SSER supplements 9 that were done in the past, we probably would have come to the conclusion that a topic should be closed. 10 11 But based on the fact that they told us 12 that they were going to be doing something different and would be submitting that information, we just 13 accepted the fact that it would stay open. 14 15 MR. ARENT: Yeah, I will give you an If you go to page 1-9, Line Item 132 on 16 example. 17 Combustible Gas Control Systems --CHAIR RAY: 18 132?19 MR. ARENT: Line Item 132. 20 CHAIR RAY: Yeah. When Unit 1 and Unit 2 were 21 MR. ARENT: 22 originally designed, they included а hydrogen 23 recombiner system as well as hydrogen igniters. As 24 of supplemental or recent changes in the part **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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requirements or regulations, basically, all we need is one now. We need the hydrogen igniters. And so for the Unit 2 project, we will not be installing hydrogen recombiners. We will actually be abandoning in place.

MR. BAJESTANI: Abandon in place. We already installed, but you would abandon them.

8 That's a change to what was MR. ARENT: 9 clearly site approved for Watts Bar and for Watts Bar 10 2. So this item remains open until our engineering 11 is done, our analysis is complete to show that we can 12 operate with just the igniters and don't need the And at that time, we will make a 13 recombiners. submittal and this item will be resolved. 14

15 MEMBER SIEBER: There's a lot of plants 16 that have done that already.

MR. ARENT: Yes.

CHAIR RAY: Well, it's comforting to see the fire protection is resolved. On the other hand, you wonder why that is resolved and some of these other things like emergency diesel engine lube oil system is open. But again, this is not --

23 MEMBER SIEBER: That would be months for 24 me to review.

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CHAIR RAY: -- seismology. Yeah. 1 MEMBER SIEBER: If I had a copy of the 2 SAR and the SER, you know, I'm sure that we can get 3 4 it out of our files and put it on a disk. And then I 5 could make sense out of all these references. MR. MILANO: We do have the SAR on disk 6 7 and we could provide it to Ms. Banerjee. 8 That will help. MEMBER SIEBER: I have 9 got about 25 gigs left on my stick here. 10 MEMBER ABDEL-KHALIK: Does the fact that 11 you have a licensing basis preservation program, is 12 that inherently counter to the SRM encouragement to use updated standards? 13 14 MR. ARENT: Actually, we are using it 15 more as a protective device than anything that would try to offset what the SRM might say. We are really 16 using it more to prevent my engineering brethren from 17 actually changing something without my recognition of 18 19 it and not without my ability to let the staff know that we have made a change. So it's really more of a 20 21 protective device for us. It's not there to prevent 22 from thinking outside the box or potentially us 23 recommending that do something, we you know, different in accordance with the SRM. 24

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MEMBER ABDEL-KHALIK: But if that is so, the guidance that you are giving to engineering that you want to preserve the licensing basis, isn't that sort of inherently counter to this encouragement?

MR. ARENT: We don't believe it is. And so far my engineering folks have not been shy in asking me if we can do something different. So we have not seen that as what I would consider anything that would defer them from making a request at least.

10 Any other questions on the CHAIR RAY: 11 licensing basis? Well, never knowing when this train 12 will go off the rails, I would like to use the remaining 20 minutes before lunch productively, if 13 possible, Mr. Bajestani, and ask if you or someone 14 15 would introduce us at least to the transition and responsibility to the extent it has occurred for the 16 engineering and construction work from what it was in 17 18 the past to what it is as we speak today.

Ιf 19 there has been no change and everything is as it was 25 years ago, why fine. 20 But 21 I would just like to begin to understand how the 22 responsibility for the design and the implementation of the licensing basis in the physical plant is now 23 24 being managed.

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149 MR. BAJESTANI: I think we are going to 1 2 cover that part of the presentation, unless you want me to cover it now. 3 4 CHAIR RAY: Well, we have got time and I 5 thought it might fit into this period, if you can do 6 it. Harold, if they are 7 MEMBER STETKAR: 8 planning to do that, perhaps as a time-filler, I hate to call it that --9 10 CHAIR RAY: It's a wise use of the time. 11 MEMBER STETKAR: Okay. Wise use, a 12 productive use of the time then. If you had planned to address that issue in a presentation coming up 13 this afternoon, we had questions earlier about shared 14 15 systems, which is -- which are more kind of statement of fact, laundry list-type things. And I don't see 16 that particular topic addressed, at least not in much 17 18 detail in your presentation. 19 CHAIR RAY: Go ahead, John, that's 20 correct. 21 MEMBER STETKAR: Yeah, I mean, could you 22 tell us very briefly, in particular, what systems are 23 shared between the two units? And this is just, you 24 know, you mentioned emergency raw cooling water. You **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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What -- and if you could, please, don't just limit yourself to safety-related systems, also non-safety systems.

5 MR. BAJESTANI: We have quite a few 6 systems actually. Raw cooling water is non-safety-7 related system. It is a shared system. We have all 8 the electrical systems, that is 6.9. It actually 9 starts from the switchyard and comes down, you know. 10 Switchyard, the start bus goes to 6.9 kV to 480 volt 11 shutdown board and load, actually 220 volts. Those 12 are all shared systems, including the DC systems, AC 13 and DC systems.

14 MEMBER STETKAR: So it's а fully 15 integrated shared AD/DC, effectively? 16 MR. BAJESTANI: Right. 17 MEMBER STETKAR: Okay. MR. BAJESTANI: And then, obviously, we 18 have some radiation monitor that --19

20 CHAIR RAY: Well, wait. Before you go on 21 then from electrical --22 MR. BAJESTANI: Sure.

23 CHAIR RAY: -- each unit has its own 24 emergency diesel generators, I presume?

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151 MR. BAJESTANI: No, no. We have four 1 2 diesel generators that is assigned for two-unit 3 operation. 4 MEMBER STETKAR: So this is more like a 5 configure -- I'm somewhat familiar with Browns Ferry. 6 This looks a lot like Browns Ferry Units 1 and 2 7 then? 8 MR. BAJESTANI: Exactly. 9 MEMBER STETKAR: Okay. Thanks. 10 MR. BAJESTANI: Not Unit 3. 11 MEMBER STETKAR: That may not help other 12 Committee Members. MR. BAJESTANI: It doesn't look like San 13 Onofre at all. 14 15 MEMBER STETKAR: It does not look like San Onofre. 16 17 CHAIR RAY: Okay. Thanks. 18 MEMBER STETKAR: That helps me at least electrical side if not other Committee 19 the on 20 Members, but I know what it looks like then. 21 MR. BAJESTANI: 40qs. They are both 22 units. 23 MEMBER STETKAR: Yes. 24 MEMBER SIEBER: Yeah. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

MEMBER BONACA: Each one of them is given a driving RCCS.

3 MR. BAJESTANI: Yes. And obviously, as 4 we go through the completion of this project and when 5 we get into the testing part of it, we have to test this diesel generator based on the load on Unit 2, 6 7 you know, provide the accident signal, loss of off-8 site power, ready for all the loads that are tied to 9 Unit 2 that are going to become sequenced and start 10 under, basically, sequenced timing. They are going 11 to start and, you know, load through the diesel 12 generator. 13 That's the part that has to be done as we 14 go through the completion of this project, the

14 go through the completion of this project, the
15 testing part of it. But the electrical system,
16 essentially, is common systems.

17 MEMBER BONACA: Are you going to recover 18 the power for Unit 2 also? But to raise the power 19 level for Unit 2?

20 MR. BAJESTANI: No, no. We want to stay 21 actually on the megawatt-thermal. We're going to 22 stay with the original license 34 --

MR. MILANO: 3411.

MR. BAJESTANI: -- 11. On the mechanical

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1 side of it, under balance of plant part of it, we are changing the low-pressure turbine, high-pressure 2 3 turbine and moisture separator reheater as a result 4 of changing all those with the new design. We are 5 expecting to get about 50 or 55 megawatts more 6 electrical output than what we are getting on Unit 1. 7 MEMBER MAYNARD: Yeah, now, from what I 8 understand, you intend to stay with the original 3411 9 to get through this licensing process. Then you may 10 try to recapture instrument uncertainty and some of 11 the others --12 MR. BAJESTANI: That's correct. MEMBER MAYNARD: -- after you get Unit 2 13 up and running and licensed? 14 15 MR. BAJESTANI: That's correct. 16 MEMBER SIEBER: I presume then that the balance of plant construction effort will take into 17 18 account the fact that you may some day want to 19 upgrade to thermal power. 20 MR. BAJESTANI: Actually, the on 21 megawatt-thermal --22 MEMBER SIEBER: Yeah. 23 MR. BAJESTANI: -- the philosophy, this 24 is again one of the lessons learned that we had from **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

Browns Ferry, we decided on this project, actually, 1 to stay with the original design not to consider --2 because just the magnitude of the work that we have 3 4 to do if -- there's going to be a lot of changes. 5 MEMBER SIEBER: Okay. MR. FREEMAN: We are making sure that the 6 7 hardware will support the entire power rate once we 8 are ready to do that. 9 MR. BAJESTANI: No, I think what he is 10 referring to is not that 1.4 percent that we are 11 going to get as a result of the LEFM. He is actually talking about the power uprate. 12 13 MEMBER SIEBER: Right. MR. BAJESTANI: Which we haven't looked 14 15 at. 16 MEMBER SIEBER: You may be able to get 6, 7, 8 percent. 17 18 MR. BAJESTANI: Yes. 19 MR. FREEMAN: I was dealing with the --20 MR. BAJESTANI: No, not that 1.4 percent. 21 MR. FREEMAN: -- concerned team. 22 MR. BAJESTANI: Okay. 23 MEMBER MAYNARD: Back to the shared 24 One of the things I think you and the staff systems. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

is going to have to be real careful of, and that's 1 the testing program, all these integrated systems and 2 I know that we are not here for licensing Unit 1, but 3 4 as you are doing the testing for the Unit 2, I think 5 also you have to make sure that there is no adverse 6 implications to Unit 1 from these shared systems. 7 MEMBER SIEBER: Right. 8 Especially in some of MEMBER MAYNARD: 9 the electrical systems and stuff. 10 MR. BAJESTANI: Exactly. Actually, I 11 have a presentation on that. What are we doing to 12 make sure that we are not impacting Unit 1 operation? 13 CHAIR RAY: Yes, we will be looking 14 forward to that, yeah. Charlie? 15 MEMBER BROWN: On talking about four diesel generators that are shared for the entire 16 17 plant, two plants, when you are operating. Does that 18 -- if you have an event in one plant, and so the 19 emergency -- that system is up and it is doing what it is supposed to do now, you know, and then later 20 21 subsequent is it sized still to handle a subsequent 22 event in the remaining plant or is there an 23 assumption that the remaining plant will not -- you 24 it sized handle both know, is to plants

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simultaneously?

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2	Not at the same time, but I mean, once
3	you have already had an event in one plant, now you
L	could be a day or half a day or five hours and all of
5	a sudden you have an event in the other plant, can it
5	then handle those events power-wise also?
7	MR. BAJESTANI: Accident signal on one
3	unit and hot standby on the other unit.

MEMBER BROWN: Okay.

MR. BAJESTANI: That's what is designed.

11 MEMBER BROWN: So that is -- okay. Let 12 me ask the question again. Does that mean if you 13 have an event in one, you have to go to hot standby 14 on the other when it occurs? Is that -- may -- did I 15 screw that up? No, I'm trying to understand when you 16 say--

17 MR. BAJESTANI: No, that doesn't mean 18 that you have to go to shut the unit down.

 19
 MEMBER BROWN: Are both units operating?

 20
 MEMBER SIEBER: You don't have to

 21
 shutdown.

 22
 MEMBER BROWN: Okay. And then one has an

event.

MR. BAJESTANI: Right.

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MEMBER BROWN: So the system kicks off, 1 2 starts sequencing dose, whatever it is. 3 MR. BAJESTANI: Right. 4 MEMBER BROWN: And I'm not talking -- I'm 5 not trying to imply there is a double failure, but once you are into an event sequence, that doesn't 6 7 mean something can't happen in the other plant that 8 then asks for a similar demand of its systems. Is 9 the plant sized to handle that or does the other 10 plant have to be -- now once an event occurs, do you 11 then have to go to some other condition, like reduced 12 power, something like that, shut it down, blah, blah, 13 blah, whatever while you are doing that? MR. BAJESTANI: What is the other event? 14 15 Is it loss of power? 16 MEMBER BROWN: I have no idea. I have no idea. 17 18 MR. BAJESTANI: Okay. I quess we have to 19 define that, because loss of off-site power, 20 obviously, yeah, you're going to shut the unit down, 21 yeah. 22 MEMBER SIEBER: Well, if --I'm sorry, Jack. 23 MEMBER BROWN: 24 MEMBER SIEBER: The ultimate would be a **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701

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1 loss of off-site power and LOCAs in each plant. Do you have enough diesel capacity to do that? Probably 2 3 not. 4 MR. BAJESTANI: No. Go ahead, Steve. 5 MR. HILMES: Let me answer this. MR. BAJESTANI: Add that. 6 7 MR. HILMES: Okay. The way the diesels 8 are set up at Watts Bar is, essentially, you have a 9 Train A that is predominant at Unit 1 and a Train A 10 that is predominant at Unit 2. The same thing on the 11 B Train, okay. The only pumps on those boards that 12 are really, really shared for both units is ERCW, 13 okay, large pumps. Those pumps be won't any different than what we have now. 14 You require 4 ERCW, one on each diesel, 15 16 for one unit operation and one on each diesel for two unit operation. 17 18 MEMBER SIEBER: Okay. 19 MR. HILMES: Okay. So unlike the way Browns Ferry works with a complicated logic to decide 20 which unit is in the accident and all this common 21 22 accident signal-type thing, essentially, 23 electrically, electrically I'm talking now, if I put 24 an accident on both units, at most I get is one set **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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159 1 of safety injection on each of the diesels. Okay? It's not nearly as complicated as some of the other 2 3 systems out there. 4 MEMBER BROWN: So is that answer a little 5 bit different? 6 MR. HILMES: It is. 7 MEMBER BROWN: Is that an event that it 8 would handle -- the power is there to handle the 9 safeguard systems for both plants simultaneously? 10 I'm trying to put this in very simple understandable 11 language. Is that a yes? 12 From a diesel generator MR. HILMES: 13 standpoint, that is correct. From an off-site power 14 standpoint, we analyze one unit and accident at a 15 time. MEMBER SIEBER: Okay. All right. 16 MEMBER BROWN: That's the only way I --17 18 okay. MR. HILMES: One accident. 19 20 Okay. All right. MEMBER BROWN: That clarifies. 21 I was just trying to get an understanding of how that worked. Go ahead. 22 23 MEMBER ABDEL-KHALIK: Historically --24 CHAIR RAY: John? I'm sorry, Said? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1 MEMBER ABDEL-KHALIK: I was just going to 2 ask historically, have the MSPI indications for the 3 diesels been green? 4 MR. ARENT: Frank, can you answer that 5 question on the MSPI indicators for the diesels? 6 Have they been green historically? 7 MR. KOONTZ: I haven't been following the 8 MSPI, but the diesels have been performing well and 9 they meet the reliability standards, so I'm assuming 10 that it's looking good for the diesels. 11 MR. ARENT: We can follow-up. We can get 12 a follow-up answer on that, specifically, the MSPIs. 13 CHAIR RAY: Okay. 14 MEMBER BROWN: Are there requirements 15 that have been -- if diesels are out of service to change the one diesel/two diesel, that you change the 16 plant configurations allowed, power levels allowed? 17 18 MR. BAJESTANI: Power level? Not the 19 power level. 20 MEMBER BROWN: I threw a bunch of things 21 in. 22 MR. BAJESTANI: No, not the power level. CHAIR RAY: There is limiting conditions 23 24 for operation, I'm sure. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

161 MR. BAJESTANI: Right. You've got a 7 1 2 day requirement, 7 days or we've got 14 days. CHAIR RAY: All right. 3 4 MR. MILANO: 14 days. 5 MR. BAJESTANI: 14 days there. 6 MEMBER BROWN: All right. 7 MR. BAJESTANI: Then you have to 8 basically shut the unit down. 9 MEMBER BROWN: You have answered my 10 question. did you 11 CHAIR RAY: John, have а 12 question? MEMBER STETKAR: Only I'm not convinced 13 that the laundry list is complete yet. 14 15 MR. BAJESTANI: No, no. 16 MEMBER STETKAR: So I mean, I didn't think it was and we have 8 minutes to complete it. 17 18 MR. BAJESTANI: There are other systems 19 that -- Steve, do you want to expand on that? 20 MEMBER STETKAR: You started talking 21 about radiation monitors. Well, we got to radiation 22 monitors and we kind of got off. 23 MR. BAJESTANI: Yeah. Steve, do you want 24 to go ahead and cover --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

MR. HILMES: I think Bill has 1 qot 2 something. 3 MR. BAJESTANI: -- the other? Oh, Bill? 4 MR. CROUCH: This is Bill Crouch, 5 mechanical. You want -- this -- just sitting here 6 off the back of our envelope here we're writing stuff 7 down. We've got the ERCW, central raw cooling water. 8 You've got the raw cooling water, the non-segregated 9 raw cooling water. You've got the emergency diesel 10 generator and its attendant fuel oil and starting air 11 systems. You've got the component cooling system 12 that supplies the cooling water to the segregated 13 coolers. And you've got --That's completely -- CCW 14 MEMBER STETKAR: 15 is completely shared? 16 MR. CROUCH: No, CCS. 17 MEMBER STETKAR: CCS. 18 MR. CROUCH: Cooling system, component cooling. 19 20 And all MR. BAJESTANI: five pumps 21 actually has been turned over as part of the -- which 22 is for both units, they have been turned over to 23 operation for part of the Unit 1 start-up. 24 MR. CROUCH: You have got like ERCW that **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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163 1 provides one side of those heat exchangers and the side of those heat exchangers provides a 2 other 3 cooling to your safety-related heat exchangers. 4 MEMBER STETKAR: But this is the safety-5 related component cooling? 6 MR. CROUCH: Yes, yes, whatever you call 7 it. 8 Thanks. MEMBER STETKAR: Okay, right. 9 Keep going. 10 MR. HILMES: Yeah, а lot of people 11 confuse it and call it the wrong thing. They have different 12 STETKAR: MEMBER names in different plants. 13 14 MR. CROUCH: Then you have got the HVAC 15 system for the Aux building as common. Control air and service air are common. What I call chillers for 16 17 the ice condensers are common, non-safety related. Auxiliary building gas treatment system, the system 18 19 that draws the secondary containment down to a 20 negative pressure. 21 The emergency qas treatment system 22 filters, the system that draws the annulus down to a 23 negative pressure, the filters are common. And Steve 24 talked about the AC and DC systems, the RAD monitors **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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are common. High-pressure fire protection has common things to it. Thank you.

CHAIR RAY: Well, it will be a challenging start-up test program.

5 And let me say one MR. CROUCH: Yes. 6 more thing. On things like the ERCW and the raw 7 cooling water and the component cooling system, what 8 we have done is we have gone and created a steady-9 state computer flow, computer calculation modeling 10 the system in both -- with two units operation in the 11 various modes of operation for one unit in accident 12 and one unit in hot shutdown.

have gone through all the various 13 We 14 operating scenarios you have to encounter with two 15 units of operation to make sure that we have enough 16 capacity in the system to handle two units. One of the things we are doing this is, obviously, the plant 17 18 was originally built for two units, but over time, 19 pumps degrade.

When we originally installed the ERCW pumps, they never quite met their original design characteristics. We are in the process of replacing those pumps with new pumps. And so we have taken all the new characteristics of new equipment and the

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165 1 current characteristics of equipment and put in these 2 computer flow models to make sure that we are going 3 to have enough capacity on these water systems to 4 handle two unit operation. 5 CHAIR RAY: What is the ultimate heat 6 sink? MR. CROUCH: Tennessee River. 7 8 MEMBER SIEBER: Yeah. 9 CHAIR RAY: Okay. 10 MEMBER SIEBER: It's official. 11 CHAIR RAY: All right. Any other 12 questions from Members? All right. We will adjourn for lunch and resume then at 1:00. 13 (Whereupon, the meeting was recessed at 14 15 11:54 a.m. to reconvene at 1:00 p.m. this same day.) 16 17 18 19 20 21 22 23 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

166 A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N 1 2 1:00 p.m. 3 CHAIR RAY: Okay. We're a little late. 4 Come to order, please. And the applicant has got the 5 floor. 6 MR. BAJESTANI: Thank you. In July of 7 2007, the NRC Commission approved the NRC staff 8 recommendation for licensing and inspection program 9 for -- approach actually for Unit 2, which is 10 essentially the Unit 1 is being used as a reference 11 for this inspection and licensing approach. 12 When we received that letter, we actually went to -- we received that in July. And in August 13 of 2007, we went to TVA Board of Directors to get, 14 15 essentially, a recommendation to approve completion of Watts Bar Unit 2 Project. We actually had, 16 essentially, four different studies before we made 17 18 that recommendation. 19 We did a power supply planning study, which, basically, that study showed that we need some 20 21 base load generation. Even today with the economy 22 the way it is, we still need Watts Bar. We can use 23 Watts Bar today, Watts Bar Unit 2. The power supply 24 planning study was completed. Then what we did, we

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actually mentioned this before, we put 100 engineers, we did, what I'll call, detailed scoping, estimating and planning studies.

4 It's the same process that we used at 5 Browns Ferry, for Browns Ferry Unit 1 to actually 6 estimate the costs and schedule and the condition of 7 the equipment. We did that study and the study, 8 essentially, came up and told us what the cost and 9 schedule is going to be and also it showed that the 10 plant equipment and material condition is in good 11 shape.

Also, Watts Bar Unit 2 is identical to unit -- Watts Bar Unit 1 and Sequoia Unit 1 and 2, which is a proven technology with a good operating capacity factor. Actually, it is over 86 percent operating capacity factor so far.

We looked at the project risks study. We actually looked at the financial and that was another study that we did. Again, based on all these various studies that we did, we went ahead to the board and made a recommendation to approve this project.

Next one. The guiding principle and philosophy behind the construction completion is: No. 1 to make sure that public health and safety; No.

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2 is make sure that, basically, whatever we do on the Unit 2 is not going to impact operation of Unit 1. Essentially, we put the right process and procedure in place to avoid any interruption of, essentially, any-- creating any new -- creating any problems for applicant site.

7 And fidelity of the Unit 1 and Unit 2 as 8 we talked about the design basis of Unit 1 and Unit 2 9 is going to be identical. And maintaining а 10 consistent, predictable and transparent process for 11 completing -- completion of the licensing part of the Watts Bar Unit 2. 12

13 What we did -- another part of the philosophy behind completion of Watts Bar Unit 2 was 14 15 we looked at any modification, any changes that Watts Bar Unit 1 has done since start-up, which was back in 16 17 1996. And any new capital improvement project that 18 they had for the next five years, which started 19 October of 2007, actually. We incorporated any improvement from, like I said, start-up and anything 20 21 that was in the plan for the next five years, we 22 incorporate all that into the scope of what we were going to do for Watts Bar Unit 2. 23

On top of that, I have already mentioned

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some additional improvement of your making on Watts Bar Unit 2, which eventually Watts Bar Unit 1 is going to do the same modification and bring both units, essentially, to be identical.

MEMBER ABDEL-KHALIK: What are the main items in that five year plan of capital improvement for Unit 1?

8 MR. BAJESTANI: Some of the issues --9 well, let me -- Steve, do you want to address 10 electrical issues, if there was anything on the 11 electrical issues? I know feedwater heater was one.

MR. HILMES: Steve Hilmes with Electrical 12 They are doing an upgrade to their feedwater 13 I&C. system to, essentially, put in a digital feedwater 14 15 Let's see, there is the changes we're system. actually doing for the -- eliminating the hydrogen 16 recombiners is in that five year plan. 17 And the 18 elimination of the pass facility is in that five year 19 plan.

Frank, do you remember any other ones? Oh, yes, and as part of the EPA issues with freon, we are replacing our, what I call, chillers. In reality, that is being -- for the ice condenser, that is actually being done for -- under the Unit 2

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MR. BAJESTANI: So essentially, what we did, we looked at the list, whatever it was in the next five year plan, and we incorporate that into the project. And also, like I said, on some of the specific improvements that we are doing on Unit 2, which Watts Bar Unit 1 eventually is going to catch up with some of the changes that we are making on Unit 1 -- on Unit 2.

10 On the project oversight. Essentially, 11 we have three major contractors that are being awarded for Watts Bar Unit 2. We have Westinghouse, 12 which is doing the entry plus part of it, that's 13 calculations, analysis and equipment like reactor 14 15 coolant pump, Eagle 21. We are going through 16 purchasing Westinghouse and all that through 17 Westinghouse.

18 Then have Bechtel, which is we 19 essentially the EPC, Engineering Procurement and Construction. And then we have Siemens, which is 20 21 doing all the turbine generator and auxiliary work. 22 But what we have, we have one QA plant,

23 which governs all contractors, vendors and 24 subcontractors.

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CHAIR RAY: How is this arrangement different than what Unit 2 experienced before the deferral?

4 MR. BAJESTANI: Okay. The difference 5 between what we have today and what we had when we 6 went through Watts Bar Unit 1, Watts Bar Unit 1, We didn't have an 7 essentially, was managed by TVA. 8 EPC actually. What we are doing, we have EPC, which 9 is Bechtel is doing engineering procurement 10 have, like construction and then we Ι said, 11 Westinghouse, which is doing the entry plus side, and then Siemens which is doing turbine generator and 12 13 auxiliary.

What we have created for Unit 2, we have 14 15 created, what call, parallel organization, we essentially. Like if Bechtel has got construction 16 17 manager, engineering manager, refurbishment manager 18 and QA manager, and I can go on, we have created 19 identical organization in the TVA side for the oversight, which we did not have that when we went 20 21 through Watts Bar Unit 1.

CHAIR RAY: Well, it seems like there must have been some turnover from what had been a responsibility at TVA to primarily, I guess, Bechtel

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172 1 now take place. Is that right? 2 MR. BAJESTANI: The turnover? 3 CHAIR RAY: The turnover of design 4 responsibility. 5 MR. BAJESTANI: The overall 6 responsibility still falls under TVA. But as far as 7 the turnover of what we have completed and what we 8 turn over to Bechtel, yes, there was a process, you 9 know, basically, that says here it is, Bechtel. This is what is left to do. 10 11 CHAIR RAY: Well, I guess I'm trying to 12 understand is responsible for somebody the engineering. Is that still TVA? 13 14 MR. BAJESTANI: Yes. Ed Freeman, he is our engineering manager. Essentially, he has got the 15 16 responsibility for overall engineering. 17 Well, that's not oversight CHAIR RAY: 18 though. I'm talking about that you have it under a heading here of "Oversight." I'm trying to figure 19 responsibility 20 out who has the for doing, 21 implementing the engineering design? 22 MR. BAJESTANI: Okay. The engineering design actually, like I said, Bechtel actually has 23 24 staff. We have over 700 engineers, actually, that --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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173 CHAIR RAY: That used to be TVA? 1 2 MR. BAJESTANI: That used to be TVA. 3 CHAIR RAY: All right. Now, so be 4 definition --5 MR. BAJESTANI: Some call it this. 6 Excuse me, some call it. 7 CHAIR RAY: All right. Well, okay. 8 Whatever part of it used to be TVA is now Bechtel. 9 There must have been some turnover take place of 10 I mean, that's the only way I can think about that. 11 it is somebody is implementing, doing the design 12 engineering and that's now somebody else. And that 13 means there has to be a turnover. Otherwise, the engineer has -- who is working today doing the design 14 15 work, I don't know what he assumes about the design work done previously. 16 17 Well, MR. BAJESTANI: okay. Let me 18 explain this and then I'm going to turn it back to 19 Ed, maybe he can expand on this. When we put the contract together for Bechtel to do engineering work, 20 21 it was -- the scope of engineering is going to be, 22 essentially, do what we have done on Unit 1, plus 23 some improvement. Okay. Modifications have been 24 done since the start-up of Watts Bar Unit 1 and

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again, the five year plan.

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Here is the scope of this work. You are going to establish baseline. You're going to walk down every system. You've going to look at all calculations, update the calculations. You're going to look at all the programs like 89.10, motoroperated valve, establish the calculations requirement for any new changes that we have to do on motor-operated valves.

10 So it was a scope that was turned over, 11 basically, that says, Bechtel, here is your scope of 12 The oversight part of it is really, like I work. 13 said, we have created, essentially, on the engineering side we have 11 very experienced basic 14 15 TVA people that are overseeing what Bechtel is doing and helping case-by-case, like here it is, here is 16 17 how we did it and here is what we need to do.

Does that answer your question?

19 CHAIR RAY: Well, I'm thinking about it. 20 I mean, I imagine myself, having been in this 21 position before, with some design problem. I would 22 expect Bechtel to say don't look at me, that was done 23 by these guys over here. I'm just making it like 24 Unit 1. And that's what I'm wondering about.

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Who is in charge of the design? And how is that being effected or is it just a matter of make it like it was at Unit 1? I don't think that's the case. That's not what you are saying, so --

5 MR. BAJESTANI: Well, the direction is really to follow the design basis, but if they run 6 7 into a problem and there are issues that we want to -8 - we have to do something different, based on the 9 calculations or based on the new program, Bechtel 10 guys they come in and go through Ed and his people. 11 And they say specifically, okay, this is what we've got to do different or what's your recommendation? 12 Ad End and his staff, they make a recommendation here 13 is how we're going to approach it. 14

15 MR. FREEMAN: Bechtel is doing the 16 engineering. And while they are not effectively 17 starting from scratch, they are doing the same 18 programs as Masoud described, you know, the baseline 19 verification program. They were looking at every calculation that has been produced. The ones that 20 21 are for both -- that can be for both units, they are 22 reviewing and making sure that that's correct and 23 making them applicable to Unit 2.

The ones that they have to do a pure Unit

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1 2 calculation, they do that. So the mantra is kind of, you know, make it like Unit 1. We are doing the 2 same programs that we did for Unit 1 to make sure 3 4 that that design is sound. But Bechtel is doing that 5 work for us. CHAIR RAY: Okay. So I would take it 6 7 from what you just said that Bechtel would accept 8 responsibility for the adequacy of the design. 9 MR. BAJESTANI: Yes. 10 CHAIR RAY: Okay. Well, that's, to me, a 11 turnover from TVA to Bechtel. Okay. 12 MR. BAJESTANI: Yes. 13 MR. FREEMAN: When you say turnover, I 14 mean, we didn't walk up and hand them anything or 15 have a turnover process where they signed you had it, 16 we've got it. CHAIR RAY: Okay. 17 18 MR. FREEMAN: But they have more or less-19 - well, they are pretty far into that work right now. And it is all a matter of, you know, they start out 20 21 list of calculations and with а other design 22 documents that must be reviewed or produced and --23 Well, when they review them, CHAIR RAY: 24 they take the responsibility for the correctness, I **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1 assume? 2 MR. FREEMAN: Yes. 3 CHAIR RAY: Or should I assume that? 4 MR. FREEMAN: Yes, that's true. 5 CHAIR RAY: Okay. MEMBER BROWN: Can I ask a question? Who 6 7 is responsible for -- that's a design engineering 8 There is still a site that has to be turnover. 9 managed, all the construction work done. You talk 10 about bringing in Westinghouse for this, bringing 11 these components, Siemens coming into TVA's auxiliary, etcetera. Do Westinghouse and Bechtel --12 13 Ι mean, Siemens work for Bechtel? Are they 14 subcontractors to Bechtel? Are they subcontractors 15 to TVA? MR. BAJESTANI: Siemens and Westinghouse, 16 they are direct contractor to TVA. 17 18 MEMBER BROWN: So all the work they do 19 on-site is under whose tutelage? 20 Under one QA plant. MR. BAJESTANI: The 21 QA plant that establishes actually TVA, a Bechtel QA 22 plant, so the work that they are doing is actually under Bechtel care. 23 24 MEMBER MAYNARD: Do you have an overall **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1 construction manager? MR. BAJESTANI: Yes, thank you, yes. 2 3 MEMBER MAYNARD: Is that a TVA --4 MR. BAJESTANI: Bechtel has over our 5 construction manager and TVA has construction 6 manager. 7 MEMBER MAYNARD: Okay. But is the TVA 8 there is an issue construction manager that if 9 between Westinghouse and Bechtel that the TVA 10 construction manager would be it? 11 MR. BAJESTANI: That is correct. 12 MEMBER BROWN: Who is in charge was what 13 I was asking. 14 MR. BAJESTANI: And the way we do this, 15 actually, we have had meetings after meetings with Siemens, Bechtel, TVA and 16 Siemens, Bechtel, TVA. Westinghouse was -- we actually defined roles and 17 18 responsibilities, written who is doing what. Like 19 when Siemens is doing a certain job, they need support from Bechtel on certain things. 20 21 that's all been defined, So but the 22 program again, if you look at it just from the 23 perspective of QA plant, every procedure, every 24 process that new, it goes through essentially Bechtel **NEAL R. GROSS** 

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approving before it actually goes in the site.

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MEMBER BROWN: There is a conflict of work? Siemens has a conflict because they can't get Bechtel to tell them their work takes precedence over somebody else. Does that settle it or do they come to TVA now for adjudication?

7 MR. BAJESTANI: They try to settle it 8 themself. It doesn't get resolved, it actually gets 9 escalated and gets to our construction manager.

MEMBER BROWN: Either TVA --

MR. BAJESTANI: TVA.

MEMBER BROWN: TVA.

13 MEMBER ABDEL-KHALIK: Do you actually have all the engineering calculations for Unit 1? 14 15 MR. BAJESTANI: What do you mean? MEMBER ABDEL-KHALIK: All calculations 16 that were done for design calculations, all 17 the 18 engineering calculations are housed and controlled by TVA? 19

MR. BAJESTANI: Yes, yes.

21 MEMBER ABDEL-KHALIK: Rather than any of 22 the vendors?

23 MR. BAJESTANI: Yes. Unit 1, all TVA 24 calculations we actually have a database, it is

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180 1 maintained by TVA design. 2 MEMBER ABDEL-KHALIK: But there must have 3 been a lot of Westinghouse calculations as well. 4 MR. BAJESTANI: Right. 5 MEMBER ABDEL-KHALIK: Do you have control 6 over those? 7 MR. BAJESTANI: Contractually. We 8 actually look at the result of some of those studies, 9 calculations, but Westinghouse has those 10 calculations. 11 MEMBER ABDEL-KHALIK: So how is that 12 information conveyed to Bechtel? 13 MR. BAJESTANI: There is a Letter, 14 essentially, of Agreement between Westinghouse and 15 TVA -- I mean, Bechtel that basically says you can use this information for this project only. Not to, 16 essentially, release it to the third-party. 17 So that 18 has been established. It's a non-disclosure 19 MEMBER BROWN: 20 agreement? 21 That's right. MR. BAJESTANI: That's 22 correct. MR. FREEMAN: That is correct. 23 MEMBER MAYNARD: That's similar to what 24 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

has been done at most plants, because usually in SSS and the AE you are --

MR. BAJESTANI: That's right.

MEMBER MAYNARD: I think Bechtel and Westinghouse are used to arguing about that.

MR. KOONTZ: This is Frank Koontz in 6 We have -- like Masoud mentioned, there 7 engineering. 8 is a proprietary agreement between Westinghouse and 9 Bechtel and it has been working very well. They 10 release documents and on their document they will say 11 this may be provided to Bechtel. So even though the 12 contracts between TVA and Westinghouse, they give us permission and release that information to Bechtel, 13 14 so they can finish the design.

15 MEMBER MAYNARD: The biggest conflict I 16 have seen has been more between the construction 17 organization and the design organization as to whose 18 fault it is that something doesn't work. Is it a 19 design problem or did the constructor put it together 20 wrong.

## CHAIR RAY: Proceed.

22 MR. BAJESTANI: Okay. I mentioned about 23 the, essentially, three major contractors. The 24 oversight is provided especially and the Bechtel it's

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provided by field managers, supervisor observations. We have quality control inspections of the water activities that is specified by engineering, any engineering requirements, any inspection requirements that is in the package. Obviously, QC is going to be doing the inspection.

7 Then we have the Bechtel QA. These are 8 all Bechtel. Bechtel quality assurance oversight of 9 Appendix B requirements, which, obviously, they do 10 some sampling of various process procedures, 11 implementation. And then what we have is in the 12 Bechtel side Project Management Review Committee. This is a committee that on a weekly basis they look 13 at all repairs, problems, evaluation reports, which 14 15 is a part of the corrective action plan. They look 16 at that. They look at the disposition and they look These are essentially what we have on 17 at the train. 18 the Bechtel side of it.

19 The on the TVA oversight of the EPC, we have the TVA management which both -- again in all 20 21 engineering procurement and construction, like in 22 engineering, we have 36 TVA actually that is 23 overseeing what Bechtel is doing on engineer side.

MEMBER ABDEL-KHALIK: Let me go back to

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183 1 the issue of documentation. MR. BAJESTANI: Yes. 2 MEMBER ABDEL-KHALIK: Does Bechtel review 3 4 the calculations that were done by Westinghouse? 5 MR. BAJESTANI: Bechtel review the 6 calculations by Westinghouse. 7 MR. KOONTZ: This is Frank Koontz again. 8 Generally, we don't have Bechtel do review of the 9 Westinghouse calculations. Those are done under the 10 Westinghouse QA Program. TVA may look at the results 11 of those calculations and see if they remain reasonable, if they are consistent with Unit 1, if 12 something else needs to be done. But we generally 13 don't have Bechtel do that review function. 14 15 MEMBER ABDEL-KHALIK: So by and large, 16 any calculations that were done by Westinghouse for 17 Unit 1, they are pretty much taken as gospel by Bechtel for Unit 2? 18 19 MR. KOONTZ: Well, no. MEMBER ABDEL-KHALIK: 20 Oh. 21 MR. KOONTZ: This is Frank again. On --22 what we are doing in the area of calculations for 23 Westinghouse is they are redoing some calculations. 24 For example, they are redoing the large-break LOCA **NEAL R. GROSS** 

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calculation for Unit 2. They are redoing the smallbreak LOCA calculation for Unit 2. And that will resolve any deficiencies that have been noted over the years in those methodologies.

In addition, they are evaluating other Unit 1 methodologies and calculations to see if they are still bounding from Unit 1 over to Unit 2. As part of the issue, we replaced the steam generators on Unit 1, so some of those calcs have been upgraded to show replacement steam generators.

11 So we have to go back to the older 12 version of the Unit 1 calculations, evaluate it, see if there is anything that needs to be done to those 13 14 calculations and if so, have those calculations 15 redone. And that's all part of the Westinghouse 16 scope of supply.

MEMBER ABDEL-KHALIK: Okay. Thank you.

MR. BAJESTANI: Okay. I mentioned about the TVA management oversight. In engineering, we have 36 TVA people that essentially watching and overseeing what Bechtel is doing in the procurement. We have 5 people in construction. We have got 9 people overseeing what Bechtel is doing.

Then we have our TVA quality assurance

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manager oversight which is 7 people. And then we have a TVA Board Advisory Committee for Watts Bar that was assigned by the board actually to watch the progress of Watts Bar Unit 2. Then what we have is Construction Completion Management Review Committee, which is a committee that -- again, we look at PERs. If this is Problem Evaluation Report, any issue that comes up in the field or on the engineering side of it, we look at the average trend. We look at any NRC submittals. And we look at audits and assessment.

And on top of that we actually use independent industry expert. This is what -- we just recently had an INPO assist visit, which we asked specifically for that to come in and look at certain areas. Any questions?

Continuing on the project oversight. This just to give you some staffing level where we are so far. Engineering --

19MEMBER BONACA:That's really not20oversight, right?I mean, Bechtel here has 1,50021people. It has engineers doing work.

22 MR. BAJESTANI: Are you talking about the 23 engineering, TVA engineering?

MEMBER BONACA: Yeah. When I look at

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1 this table, you know, if you count the number on the 2 Bechtel side, it's about 1,300 people. So this must 3 be the work force that does the actual engineering 4 work. 5 MR. BAJESTANI: That's correct. 6 MEMBER BONACA: So the oversight probably 7 is what the TVA oversight? 8 It's the TVA oversight. MR. BAJESTANI: 9 MEMBER BONACA: Okay. Good. All right. MR. BAJESTANI: 10 Yeah, yes. Again, just 11 the numbers give you the number of engineering. 12 Bechtel manual, non-manual, which non-manual just defines it as field engineers, planners, procedure 13 writers. And then project control, which is really 14 15 scheduling and cost. And then nuclear assurance, 16 which Bechtel has got 33 of them and TVA 6, actually 17 7. 18 And then the supply chain procurement 19 specifically, we've got 33 Bechtel and 7 TVA. Engineering is fully staffed, at this point, 20 you 21 The overall staffing for Watts Bar, we are know. 22 looking at going on the Bechtel side of it going to 23 2,300 people. On the TVA side of it, we're looking 24 at going, right now TVA Watts Bar Unit 1 the TVA

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staffing is about 500 people.

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With two unit operations, we're going to go to 800 people. And we have actually hired 140 that are going through various training, so when we get to -- close to the end of the project, all those people are going to be trained and ready to support Unit 2 operations. Any questions?

Next page. I'm going to go through some
of the lessons learned. Again, some of these lessons
learned from various either industry, Watts Bar Unit
1, Browns Ferry Unit 1, and also the first cycle of
operation of Browns Ferry Unit 1.

Organizational 13 structure. We are different than how we did work at Browns Ferry then -14 15 - and Watts Bar actually, than what we are today. We have created, what we call, nuclear generation group 16 17 versus the nuclear power. Nuclear power is just 18 going to be focusing on the operation side of it. 19 Nuclear generation is going to be, basically, responsible for a new nuclear generation, which Watts 20 21 Bar Unit 2 falls under that category.

And the difference is before we were reporting to chief nuclear officer and the chief nuclear officer used to report to chief operating

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officer. Today we report to senior VP of nuclear generation, which he reports directly to chief operating officer.

Safety-conscious work environment. We 4 5 have two programs. Actually, one program, but two -one for Bechtel, one for TVA with managers for TVA 6 7 and manager for Bechtel. Gordon mentioned that part 8 of our historical data review was to look at those 9 43,000 historical data that we have from Watts Bar 10 operation, we have from Watts Bar Unit 1 Unit 1 11 construction. We are looking at every one of those 12 and we are picking up any employee concerns that we have had from Watts Bar Unit 1 to look at 13 the applicability for Unit 1 -- I mean, for Unit 2 and 14 15 how we are going to disposition that.

We have actually created a group with, approximately, 15 people just to look at those historical values.

19 CHAIR RAY: I'm wondering whether the use of the word conscience was deliberate or meant to 20 21 convey something else or whether you meant conscious. 22 MR. BAJESTANI: Conscious. 23 Spell check. CHAIR RAY: 24 MR. BAJESTANI: Spell check. Yeah, we

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got it.

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CHAIR RAY: Well, no, it could be intended.

MR. BAJESTANI: I wish it were. Also, what we have done on the safety-conscious work environment is we have had independent assessment of employee issues and policing how we're doing on the safety-conscious work environment. The results of some of this independent assessment that we have had so far has been very good. The program is solid.

11 The difference again between this program and what we had at Watts Bar Unit 1, besides the two 12 different organizations that we had, Bechtel employee 13 concerns, TVA employee concerns, we also have created 14 15 like exit interview. Everybody that leaves the site 16 we go through an exit interview and ask them for any issues that they had before they leave the site, so 17 18 we make sure that we take appropriate action.

And as of last week, we have had actually about 500 people that they have come to Watts Bar Unit 2 and they have left. So the program is working very well as of --

23 MEMBER BROWN: What do you mean by that,
24 they have -- 500 people have come and left?

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1	MR. BAJESTANI: Yes.
2	MEMBER BROWN: What do you mean? They
3	didn't want to work for you?
4	MR. BAJESTANI: No. And let me explain
5	to you. Just some
6	(Simultaneous speaking)
7	MR. BAJESTANI: I'll give you some
8	explanation here. Some of them, obviously, better
9	opportunities, a lot of them. Some of them, they
10	come in, the job is done. Like I'll give you an
11	example. We retube the condenser with stainless
12	steel. We used to have copper. The 50 to 70 people
13	that we had for that job, the job was completed and
14	they are gone. So that's how we count. The total
15	number
16	MEMBER BROWN: But you interviewed them.
17	MR. BAJESTANI: Yes, we interviewed,
18	exactly. We interviewed every one of them that
19	leave.
20	MEMBER BROWN: Including the disgruntled
21	ones that decided to leave because they didn't want
22	to work for you any more?
23	MR. BAJESTANI: That's right.
24	MEMBER BROWN: I'm saying that with a
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little tongue in cheek.

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2	MR. BAJESTANI: No, that's okay. Okay.
3	Let me talk a little bit about the configuration
l	control. One of the major issues that we had at
5	Watts Bar Unit 1 was our configuration control. What
5	I mean by configuration control is really the field
7	didn't match what we had on the paper.

What we have done for this project, the first thing that we did was establish -- essentially, for 6 months we put people to look at, to walk-down every system, large bore, small bore, cables, small piping, pipe support, basically to establish our baseline. Where are we as far as today with respect to the drawing that we have?

15 So we spent a lot of time, you know, like I said for the last 6 months that has practically 16 17 been the major part of the engineering work. And then when we finish with this walk-down, we get all 18 19 these packages. These packages actually sent to engineering for input to the design, like for stress 20 21 analysis. All the data that we get on the small 22 bore, large bore piping is actually done by first and 23 second party verification. Then we have, what we 24 call, walk-down data package. We review that and

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then we turn it over to engineering. Engineering looks at it and then they use that data for the stress analysis.

So we establish --

MEMBER ABDEL-KHALIK: Where does the licensing basis preservation program interact with this process?

8 MR. BAJESTANI: Licensing basis? Okay. 9 Any changes that engineering issue, design output 10 document, before they actually issue that design 11 output document, there is a checklist that they go 12 through. And they say, okay, the change that we are making it impacts, if it does impact, the response 13 to 14 that will be provided NRC on generic 15 communication.

So there is a checklist. There is a process actually that, I think, Gordon kind of explained that, that engineering goes through to make sure the changes that we are going to make is not going to impact what we have already committed or what we have already submitted.

MEMBER ABDEL-KHALIK: Okay.

23 MEMBER MAYNARD: Or if it does, you 24 identify it so you can resubmit or what?

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MR. BAJESTANI: If it does, we have to come back and do through the approval through NRC again.

MEMBER MAYNARD: Okay.

MR. BAJESTANI: 5 Again, what we wanted to 6 do really the difference between this project and the 7 other project that we have had, we wanted to spend 8 the time up front to establish a good configuration control and that's what we have done so far. 9 Any 10 questions on configuration control? If not, I will 11 talk a little bit about the corrective action.

MEMBER MAYNARD: Are you taking advantage of the newer electronic media for -- at your field walk-downs and your design and stuff? Are you going to come out basically with a paper design or is it going to be electronically available?

MR. BAJESTANI: It's going to be electronically available. Do you want to respond, Ed?

20 MR. FREEMAN: Well, if it needs to be, I 21 mean, drawings and calculations and everything reside 22 in an electronic database these days and can be 23 called up by anybody and viewed and printed.

MR. BAJESTANI: And the corrective action

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1 program, we have -- what we have done, essentially, we are using the same corrective action program that 2 3 the operating site uses. And obviously, the process 4 and procedure that the operating site uses is based 5 on all the lessons learned from industry and within the TVA. using the same for 6 We are process 7 identifying problem in the field and how -- this 8 disposition. 9 Well, this is different MEMBER BROWN: 10 from the other corrective action programs, the 29? 11 MR. BAJESTANI: Yes. That is different. 12 MEMBER BROWN: This is actual implementation. 13 14 MR. BAJESTANI: Right. 15 More control, okay. MEMBER BROWN: 16 MR. BAJESTANI: Yeah. If you --17 MEMBER BROWN: I got it. MR. BAJESTANI: -- go back to the early -18 - late '70s and early '80s, it's really essential in 19 the construction side of it. The only issue that we 20 were documenting in all this was under nonconformance 21 22 report. Here we are documenting every issue under 23 human performance trends, adverse trends, all that. 24 It is all captured by corrective action program. Α **NEAL R. GROSS** 

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big difference between what we used to have versus what we have today.

3 And year to date, actually, on this 4 project I looked at the report the last time and we 5 had a little bit over 1,500 PERs that we have written on different projects. I mean, on different issues. 6 7 And the other thing that we have, which we didn't 8 have when we went through Watts Bar Unit 1 is the 9 anonymous PER. Anybody can identify issues. If they 10 don't want to be identified, they can actually write 11 the issue and drop it in a box. We look at it. We 12 evaluate it and we disposition what we are going to do, which has helped us also to eliminate some of the 13 issues that we had with employee concerns and other 14 15 issues that we went through as we were going through Watts Bar Unit 1 construction. 16

Some of the lessons learned from Browns 17 18 Again, Browns Ferry, when we went through the Ferry. 19 Browns Ferry completion, we had to decide the completion of the project. 20 We also took license renewal and extended power uprate. 21 So what we are 22 doing, like I explained before, we are really going 23 to stay with what we need to do to start up Watts Bar Unit 2 limit the scope of the work that we are going 24

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I mentioned about the several organization and the NGDC, nuclear generation, and how we're going to do this. It's different again than what we did for Watts Bar Unit 1.

At Browns Ferry some of the work force 6 7 issues that we had when we went through Browns Ferry 8 completion, we had some shortage of pipefitters, 9 welders, pipefitter welders and we had a shortage of 10 some electricians. And for this project, so far we 11 haven't had really any issues, obviously, because of 12 the economy. And we don't expect to see really any problem to get the right number of craft that we need 13 for this project. 14

15 We did have some issues at Browns Ferry scales, specifically on some 16 on the instrument 17 tubing, compression fittings. And what we have done 18 for this project, we have put the process and 19 procedure in place that we are going to limit the number of people that they are going to do certain 20 which is, like I said, under instrument 21 scales, 22 tubing. We're going to train them more than what we 23 did at Browns Ferry. And we are going to provide additional supervision to make sure somebody listens, 24

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some of the issues we had at Browns Ferry is not going to happen here at Watts Bar Unit 2.

3 Material and contract issues. Aqain, at 4 Browns Ferry some of the material we had late 5 delivery. And what we have done here for this project actually before we started this project, we 6 7 went ahead and set aside some money to go ahead and 8 get some of these long-lead material, specifically 9 forging. We actually committed back in 2007, summer 10 of 2007 on some of those forging. It is being built 11 right now in Italy, Germany, Japan and Korea 12 actually, some of the large forging that we have specifically for turbine generator. 13

So we learned from Browns Ferry. We have captured the lessons and we incorporated that into this project.

And the construction lessons learned. 17 The area of construction, specifically, we learned 18 19 that any time that we start something new, it's something that craft doesn't have the right -- that 20 21 they don't do this on a regular basis, that's put it 22 this way. We found that what we have to do is really 23 go through additional training and through some type of checklist. 24

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So we have created, what we call, firsttime evolution checklist for anything that we do new that is not routine. We actually go through this first-time evolution checklist and make sure all of the pre-job briefing everybody understand what are some of the issues that we have had on this specific issue like turbine installation, rake and splices, what are some of the stuff that we got to be worried about.

We pull actually the operating experience from various databases and we go through it and say okay, here is what we learned from it and we want to make sure we don't make the same mistakes. So again, that's different than what we did on some of the other projects.

16 Same thing with the non-routine 17 activities. Again, that's additional training, 18 additional checklist to make sure that we don't make 19 the same mistake that we made at Browns Ferry or Watts Bar Unit 1. 20

Another issue that we had at Browns Ferry, some of the equipment that we bought, it was manufactured outside the U.S. and we didn't have some of the vendor support when we actually start going

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through the pre-op start-up testing. And it did create some problems. And what we are doing for this project for anything that requires vendor technical support, we plan on this and we have been so far like we actually installed, what we call, a secondary containment door.

7 We brought the vendor when we went 8 through the start of the testing program for this. 9 So we learned from it at Browns Ferry. We want to 10 make sure that we have that technical support. That 11 technical support is really necessary to go through 12 the pre-op start-up type activities.

And then the other thing that we have 13 done is we actually developed an orientation package, 14 15 because, obviously, here is the construction unit and right next to it we have the operating unit. We got 16 to be worried about a whole bunch of different things 17 18 as we go through completion, construction completion 19 of Watts Bar Unit 2. The craft, the supervisors, they have to be worried about a whole bunch of 20 21 different things.

And we are training those guys to do these specific needs, like the secondary containment, fire protection, so on and so forth. Part of the

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1 orientation package, actually, we had a picture that shows what they need to be worried about. Again, 2 3 this is lessons learned from Browns Ferry. 4 The other thing --MS. BANERJEE: Excuse me. 5 6 MR. BAJESTANI: Sure. 7 MS. BANERJEE: Do you have any color 8 coding in between two units? 9 MR. BAJESTANI: When we finished with the 10 two units, yes. We're going to have a different 11 color on Unit 1 than Unit 2. Unit 1 doesn't have a 12 MS. BANERJEE: specific color, so that people know they are --13 14 MR. BAJESTANI: There are. 15 MS. BANERJEE: -- giving out this. It's a unique drawing of Unit 2? 16 17 MR. BAJESTANI: There are some systems 18 that they have a color specification. Like fire 19 protection is red. The lube oil system is yellow. But the rest of the -- like we want to make sure that 20 there is a difference, just like what we did at 21 22 Browns Ferry, between Unit 1 and Unit 2 and the 23 performance. 24 Right. Yeah, that's what MS. BANERJEE: **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701

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201 1 I'm saying. MR. BAJESTANI: And we're going to do the 2 3 same thing. We're going to have a different color. MS. BANERJEE: But they are not there 4 5 yet? 6 Not yet, no. MR. BAJESTANI: 7 MEMBER SIEBER: Some folks actually paint 8 the walls of the buildings of one unit a different 9 color than the other unit. 10 We have Steve, he MR. BAJESTANI: is 11 actually from Unit 1, is the active SRO. Steve, do you want to expand on that? 12 13 MR. SMITH: Yeah. 14 CHAIR RAY: Get to a microphone. 15 MR. SMITH: Steve Smith. I'm a SRO in Unit 1 right now doing the interface between Unit 1 16 17 and Unit 2. Back in the '90s when we did our initial component labeling, we did establish Unit colors. 18 Unit 1 has a color of yellow. Unit 2 is the color of 19 light blue and the common systems are white. 20 So we 21 do have a unit color-coding system that is setup. 22 All the labels that are in the plant are labeled that 23 way. As a matter of fact, for this separation 24 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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in the floor that says, it's a yellow stripe, you are now entering Unit 1 operated area, so that the people working on Unit 2 will see that to go there. So there is a unit separate based on colors. I just wanted to clarify.

MEMBER SIEBER: When you are in the construction mode, will you actually fence off or wall off certain areas, so that you don't have people, construction workers wandering into the operating plant for some reason or other?

12 MR. BAJESTANI: I can go -- that's the 13 next slide I was going to talk about.

MEMBER SIEBER: Okay.

MR. BAJESTANI: The unit separation.

MEMBER SIEBER: Okay. I'll wait.

17 MR. BAJESTANI: Okay. The others are 18 lessons learned that we have done. Actually, we have 19 picked up any lessons learned that was issued from like 20 NRC, INPO, NEI, INPO-805 on historical 21 construction experience to apply on the new plant, 22 NRC information notice on experience related to assurance of the quality and construction nuclear 23 24 plant.

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And, like I said, there are a whole bunch of different documents and that we have looked at those to make sure that we understand what those issues are and learn from it and make sure that we have incorporated that into Watts Bar Unit 2 construction completion.

7 Unit separation. We have a operational 8 separation and physical separation. Operational 9 separation is actually done by lifting wires, 10 removing handwheel on the valve or installation of 11 the blind flanges. Okay.

12 physical separation, On the we have actually put fence and chain. 13 We have tagged and marked what is Unit 1, what's Unit 2, especially 14 15 where the area that we have the common system that one side is Unit 1, one side of it is Unit 2. 16 Tt. shows that Unit 1, Unit 2. All the Unit 2 craft 17 18 personnel, they wear yellow hardhat, which is anybody 19 walks into the site, they can see who is working where, you know, that helps us to identify the Unit 2 20 21 personnel.

We have designated walkway. As Steve mentioned, we have actually painted certain area of the plant. This is the walkway that we want to make

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204 1 sure that Unit 2 people walk. MEMBER STETKAR: 2 It's a really petty 3 little thing, but, Steve, didn't you just say that 4 Unit 1 color was yellow? 5 MR. SMITH: The hardhats are color --6 MEMBER ABDEL-KHALIK: Turn the mike on. 7 MR. SMITH: Oh, I'm sorry. The hardhats 8 they use are a darker yellow. It's a light yellow 9 for the Unit 1 color. But we had a lot of hardhats 10 the right color, so we used that to identify the Unit 11 2 people. 12 MEMBER STETKAR: Okay. 13 MEMBER BROWN: Say that again. 14 MEMBER STETKAR: Okay. 15 MR. BAJESTANI: Okay. You mentioned that 16 the --17 Dark yellow is really MEMBER BROWN: 18 blue? 19 MR. BAJESTANI: No, no, no. 20 MEMBER STETKAR: There's a lot of colors 21 I would have picked. Yellow probably wouldn't have 22 been one of them, but I just wanted to make sure. 23 Since you capitalized yellow. 24 MS. BANERJEE: It does not come to color **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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blindness, I guess.

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MR. BAJESTANI: Again, when we finish actually doing the coloring, right now if you look at the turbine generator, I know some of you guys are going to come visit Watts Bar, if you go on the turbine deck, the generator is actually brown. So it's not really that we have color. Actually, we have painted the unit to the system that it is supposed to be.

10 So you're going to see very clearly where 11 Unit 2 personnel are working with the yellow hardhat. 12 MEMBER SIEBER: And so every construction 13 worker will have a protected area access permission? 14 MR. BAJESTANI: Yes. If they are going 15 to deviate from the route that Unit 2 personnel are allowed to go, they have to go through work control, 16 operation work control, which is David Webb, and then 17 18 he calls the -- he actually authorizes specific area 19 that they are going to deviate from normal path, if they have to go, if there is a need for them to go 20 21 certain areas.

22 MEMBER SIEBER: Yeah, I'm just asking 23 about your security arrangement. You know, everybody 24 gets badged the same way regardless of whether they

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1 working on the operating plant are or the 2 construction plant. 3 MR. BAJESTANI: Right. 4 MEMBER SIEBER: Okay. 5 MR. BAJESTANI: We are actually -- I'm 6 going to get to -- let me go through this and then 7 I'll explain how the access --8 MEMBER ABDEL-KHALIK: What is the control 9 room layout? 10 MR. BAJESTANI: The control room layout, 11 again, the common control room Unit 1 on one side, Unit 2 on the other side and then middle where we 12 have all the common equipment. So each charter is on 13 one side of it. Diesel generator, CCS, ERCW and 14 those are on the other side of the -- between the two 15 16 horseshoes. We've got horseshoes on Unit 1, horseshoe on Unit 2, common equipment on one side, 17 18 common equipment on the other side. 19 MEMBER SIEBER: Are you going to build a wall through the middle of the control room while 20 21 they are working on Unit 2? 22 MR. BAJESTANI: No. We do not want to build a wall and the reason for that is when we 23 24 described the electrical system, there are some **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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207 1 electrical systems right now today in the horseshoe on 6.9 kV that is actually required for Unit 1 2 operation. So if we put a wall, the operator on Unit 3 4 2 is not going to be able to see it. 5 But what we are doing is we are looking 6 at putting a noise reduction curtain that when we 7 start drilling the panels, because we are, 8 essentially, moving a lot of switches and gauges to make sure we reduce the noise on the other --9 10 MEMBER SIEBER: Distraction. 11 MR. BAJESTANI: Exactly. 12 MEMBER SIEBER: It's a distraction for 13 operators. 14 MEMBER BONACA: This is a suggestion. 15 When you come back for the whole Committee meeting, 16 it will be useful to have some, you know, visual 17 aids. 18 MR. BAJESTANI: Sure. 19 MEMBER BONACA: I mean some maps or pictures of the control room to get a sense of the 20 layout for the construction progress and also a 21 22 layout of the plant. 23 MR. BAJESTANI: Yes, the last bullet here 24 is construction access. To eliminate some of the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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traffic on the Unit 2 side, because the way that the unit is set up, in order for us, for Unit 2, to go in containment, you have to go through Aux building, auxiliary building. Which you go through auxiliary building, you're going to have to go through RCA, the Radiological Control Area.

7 So what we decided to do to minimize this 8 distraction on the operating side, we went ahead and 9 cut two holes, essentially, on lower containment to 10 access to the containment without going through RCA. 11 And we have an opening on the upper containment that 12 is going to go through additional equipment building to the upper containment part. And we did that 13 specifically to minimize the traffic in the Unit 1. 14

15 MEMBER MAYNARD: So you are putting --16 you are cutting a hole in containment or through 17 another building to get into containment?

18 MR. BAJESTANI: Through another building19 to the access building to the containment.

20MEMBER MAYNARD: Okay. That's all right.21Okay.

22 MR. BAJESTANI: So to answer your 23 question on future work, because what we did actually 24 we went through Unit 2 containment to make sure that

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there is no radiation, no contamination, no --

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## MEMBER SIEBER: Yeah.

3 MR. BAJESTANI: So we have always 4 repeatedly -- the essential containment, that's when 5 they actually did the containment opening. And we look at it in the future of whether or not we need to 6 7 have the people that are going into containment that 8 we need to have additional -- do we need to basically 9 have all the requirements like going through RADCON 10 containment. We don't need to have really go through 11 the RADCON training to get to the containment any 12 more. 13 MEMBER SIEBER: Um-hum. 14 MR. BAJESTANI: So we're going to look at 15 it and see what we need to do to eliminate that requirement. 16 17 Okay. We talked about the organization. 18 Now, let me talk a little bit about the -- how we 19 review work that is common to both units. And what do we do. 20 21 Work in the operating environment. Any 22 work that we are doing that's in the operating area, 23 we actually look -- first of all, it's identified 24 right on the first page of the construction and it is **NEAL R. GROSS** 

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being reviewed on a daily basis what that work is and what potential impact is. There is a discussion, detailed discussion on that on a daily basis. And Steve again, he is actually a Unit 1 SRO, he sits in that meeting and, obviously, he pays а lot of attention to all these areas.

MEMBER ABDEL-KHALIK: But who is in charge?

MR. BAJESTANI: Who is in charge of? 10 ABDEL-KHALIK: Of in MEMBER work 11 operating spaces that are -- have to be accessed by 12 construction people. Is it the SRO of the operating unit? Is it the shift manager of the operating unit? 13 14 The people in charge?

15 BAJESTANI: It goes through what MR. It goes through -- essentially, if it is 16 management. common area and it's going to impact -- it could 17 18 impact Unit 1, it goes through Unit 1 operations. 19 The work is actually scheduled in Unit 1. So 20 everybody knows what everybody does.

21 MEMBER MAYNARD: Work management has a 22 tie to the operating plant, does it not? 23 MR. BAJESTANI: Yes, yes.

> MEMBER MAYNARD: Okay.

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MR. BAJESTANI: Yes. 1 2 MEMBER MAYNARD: The way you do business 3 today, right? 4 MR. BAJESTANI: Exactly. That's the way 5 we do business today. Again, also for any work that we are doing on the Unit 2 side, still every work 6 7 order is reviewed by experienced ex-SROs or operator 8 that used to work at TVA or Watts Bar, specifically. 9 We still review all the -- even work that we do on 2 10 side through experienced Unit operational 11 personnel. And also, any Problem Evaluation Report, 12 PER, is also reviewed by operations, which is Unit 1 operation, on a daily basis to see if there are 13 issues that impact Unit 1. 14 So that is also being 15 reviewed on a daily basis. 16 I said, And like any work that is 17 actually common to -- any work on a common system 18 actually goes through work management on Unit 1 in 19 operations. Any questions? Did I answer the question on the physical separation? 20 21 MEMBER SIEBER: Yeah. 22 MR. BAJESTANI: Okay. If there is no 23 other questions, I'm going to turn it to Ed Freeman. 24 He is going to -- okay, Ed? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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MR. FREEMAN: Okay. I've got a couple of slides here talking about the project schedule. Masoud and Gordon have kind of already laid the ground work for this.

Our project was approved, as mentioned, in August of '07 by the TVA Board and the official kick-off was in October of that year. It is a 60 month to commercial operation schedule. And we are pushing to try to bring the project in a little bit early, naturally.

In order to achieve this, I'll direct your attention to the -- about the middle of that slide there that shows that the major engineering complete milestone would be done by the end of this calendar year, with the operating license update and FSAR submittal to be in March of next year.

Those milestones are key, of course, to delivering the project on time and to give the NRC ample time to review those documents associated with that.

CHAIR RAY: And what's the allowance if there is hearings required? Do you accommodate that here somehow, if there is a hearing required?

MR. ARENT: Yes, the hearings are

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accommodated in parallel and our expectation currently would be is that they would begin some time in the first calendar quarter of 2011.

CHAIR RAY: Okay.

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5 MR. FREEMAN: Other of our major 6 milestones shown on that page is completing the work 7 on the turbine deck in October of 2010. We call that 8 our 10/10/10 date. Completing the cold hydro, the 9 primary hydro in May of 2011. And our hot functional 10 testing that is in August of 2011. Ready for fuel 11 load in April of 2012 and commercial operation in 12 2012. And again, we are hoping October of to establish some margin to that schedule. 13

14 If you go to the next slide, I'll get 15 into some specifics of the project critical path. 16 Our critical path is through the ERCW system. This 17 is one of the shared systems. And as Mr. Crouch has 18 mentioned previously, we do have some work to do on 19 this system replacing all eight of the pumps.

Our flow model showed that there was, basically -- the system was okay as originally designed, but there was no margin to account for instrument inaccuracies or degradation of the pumps with regards to their capabilities. So we are -- we

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have elected to replace all of our pumps with higher capacity pumps. The pumps that we have selected have about 20 foot ahead and should allow the system to take on the second unit of operation, have more relaxed, if you will, maintenance frequency due to degradation and stuff like that.

We have that -- because they are shared systems, we have to coordinate the replacement of the pumps with the operating units to be sure that the work windows fit their needs and requirements and we can look through the pumps one at a time and get the pieces that will be refurbished at the same time back from our vendors and get them all installed.

And once the pumps are installed, and I'm 14 walking you through here the time line to show you 15 why this is a critical path, once we have sufficient 16 pumps installed, we have to go through the process of 17 18 beginning to introduce flow into the Unit 2 flow pass. And that's kind of a deliberative process that 19 we have to go through and be sure that we continue to 20 21 meet the operating unit's requirements as we divert 22 flow from the system through those flow paths and 23 rebalance the system as we go.

That will take some time to work through

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that. We expect a lot of oversight from the operating -- from our operating staff, as you might imagine. And we'll just have to plan that well and be sure that we execute it well.

We have other work on the system as well. You know, having only one unit in service has been convenient when it comes to doing maintenance on the system. And now with the second unit it is coming on-line doing activities like strainer maintenance. It really can't be done, because there will always be one unit or the other in service.

12 So we have -- are planning to, at this upcoming outage this fall, install cross-tie headers. 13 It is downstream of the strainers, but it will be 14 15 the 1-alpha and the 2-alpha, the ERWC between headers, and 1-bravo and 2-bravo in order to continue 16 17 flow while we have a strainer out for maintenance.

18 Similarly, the way that the bays are 19 arranged, you know, and again because we won't be the system out of service during 20 able to take 21 refueling outages any more, we will be installing a 22 diver protection system. It will basically be a 23 still cable net in between to kind of split the bay into two pieces, so that divers can go down and do 24

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1	the necessary inspections in the intake structure and
2	clean out silt and do those types of maintenance.
3	Again, we expect to install or at least
4	partially install that this upcoming outage with the
5	possibility of additional work in the next outage.
6	Bill, do you have anything to add? Did I
7	miss anything? Okay. I'll move on.
8	CHAIR RAY: Just out of curiosity, does
9	that mean done under 50.59 for
10	MR. FREEMAN: Yes, it is. Because it is
11	turned over to the plant, its design change using the
12	Unit 1 process and 50.59.
13	CHAIR RAY: An interesting write-up.
14	MR. FREEMAN: Continuing, there is three
15	systems that I mentioned here that are near critical
16	path. I mentioned moisture separator reheaters. The
17	turbine deck worked just in particular. As Masoud
18	has mentioned, we are replacing all of the turbine
19	elements with higher efficiency elements and that
20	includes installing new moisture separator reheaters.
21	Those were basically taken for Unit 1 purposes years
22	ago and so we have to purchase new ones.
23	What is making this a new critical path
24	is delivery of the last of these is set for the
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spring of next year. And the process of getting these big commodities up on the deck and connecting all the large piping and small piping and the instrumentation and electrical connections, it runs right up to our target of October 2010 in order to get that complete.

7 Another system is the ice condenser 8 system. Again, this one is near critical path 9 because of the piece parts that we need. Ice 10 containments condenser are not common in the 11 industry, so I mean, the parts that had been taken 12 for spare parts, I think someone mentioned, you know, about our unit becoming a spare parts warehouse for 13 Unit 1 and Sequoia. 14

There have been some parts taken. There are some parts damaged. And we secured a vendor to manufacture those parts for us, but actually getting them made and getting them here is going to push that system out late as well.

And the third system mentioned on the slide is reactor protection. We are installing Westinghouse's Eagle 21. Again critical path because of the delivery cycle for this system. It is due to arrive in June, I believe, of 2010. A lot of wires

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going to this system, so basically once we receive it, we have to install it in the auxiliary instrument room, pick up all of those electrical connections, do our in situ testing of the racks themselves. And then begin to do the full loop test with the systems that it interfaces with.

It interfaces with many of our safetyrelated systems. And this testing has about two months of float to the critical path of the first system that requires it to be in operation.

11 So as we continue to receive information 12 on this system, we may refine our schedule and 13 establish a little more margin to the critical path. 14 But as of today, that's where those systems stand 15 and where our schedule stands.

MEMBER SIEBER: Okay. Let me break yourtrain of thought.

MR. FREEMAN: And I was going well.

19MEMBER SIEBER: Your control room is20going to have two different instrument systems in it.21So I presume Unit 2's control layout, perhaps the22logic, will be different than Unit 1?

23 MR. FREEMAN: No, not substantially. Our
24 -- I have a slide in here that talks about unit

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differences.

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MEMBER SIEBER: Well, when you get to that slide, we want to talk about the differences. Keep in mind my question and my question is are you going to have dual licenses for operators who are going to have operator's license one for -- one group for Unit 1 and one for Unit 2?

MR. FREEMAN: Yes, I do plan to address that specifically between myself and Mr. Hilmes. We will walk you through that.

## MEMBER SIEBER: Okay.

The next slide, 12 FREEMAN: MR. Okay. The next slide just shows some of 13 please. the Some of these are estimates from the 14 commodities. 15 original project estimate that Masoud mentioned. Some have been refined or discounted a little bit as 16 we worked through the engineering processes. We have 17 18 learned that the scopes are going to be less than expected. If you have any specific questions, I'll 19 address it, but otherwise, we'll move on to the 20 refurbishment slide. 21

22 MEMBER SIEBER: On this slide, do you 23 happen to know or have available easily to you what 24 the already installed commodity amounts are?

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1	MR. FREEMAN: I don't.
2	MEMBER SIEBER: These are totals, right?
3	MR. FREEMAN: Ah
4	MEMBER SIEBER: This is
5	MR. BAJESTANI: This is what we're going
6	to be replacing. But we don't have the number of
7	what has already been installed.
8	MEMBER SIEBER: Okay. Thanks.
9	MR. FREEMAN: Okay.
10	MR. BAJESTANI: We can follow-up and give
11	you that.
12	MEMBER SIEBER: Well, it's not that
13	important.
14	MR. BAJESTANI: Okay.
15	MR. FREEMAN: Okay. If you would go to
16	the next slide, please? The next slide is entitled
17	Refurbishment. Now, we have talked about this some,
18	so a lot of what I'm about to say might be a repeat
19	or maybe a new emphasis on some of the key points
20	that we wanted to bring out.
21	I'll first go to the second major bullet
22	there where it says "no credit for lay-up" and
23	emphasize that. What that means, basically, is we
24	are not reducing any of our refurbishment or
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inspection activities just because something was in lay-up for, you know, X number of years.

We will approach this, you know, with the intent to disassemble this and inspect it and visually verify it and replace all the lubrication that we have to to establish an as-new condition. So when we say no credit, that's what that means. We are not reducing any of those requirements as a result of being in lay-up.

Now, Gordon mentioned, you know, that there was interest in the lay-up time line and I took advantage of some of our time and laid out a rough time line for when things were in lay-up and when it began and when it ended for the major commodities.

15 We began to put equipment into lay-up in around 1985. Over -- of course, over the time of 16 17 about three years, from '85 into '88, we qot substantial parts of the Unit 2, the equipment that 18 would not be required for Unit 1 into a lay-up 19 And '88 was the time that TVA made the 20 condition. 21 decision that they were going to focus on Unit 1. We were going to focus on our other units that were 22 23 operating. And Unit 2 for now is put off.

From that time frame, 1989, the Nuclear

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1 Performance Plan that has been previously mentioned said that Unit 2 was in a lay-up condition. And for 2 3 the next 12 years, up until the 1999/2000 time frame, 4 it remained in that lay-up condition. That lay-up, 5 of course, was dry, warm air being blown through the systems, rotating the large equipment that required 6 7 it and doing those kind of things, preventative 8 maintenance tasks ultimately. 9 MEMBER BONACA: So you feel you had consistently good lay-up? 10 11 MR. FREEMAN: I'm sorry? 12 MEMBER BONACA: You feel that you had a 13 consistently good lay-up? 14 MR. FREEMAN: We do. For that time frame 15 we did. MEMBER BONACA: What does that mean? 16 At 17 Browns Ferry 1, you didn't? MR. FREEMAN: I'll speak to Browns Ferry. 18 19 MEMBER BONACA: Of the same time frame, you had some issues. 20 21 MR. BAJESTANI: Yeah, you know, it goes 22 back to what we -- what Ed discussed and what -- we 23 really are not taking credit, essentially, for the 24 long lay-up. We are disassembling equipment, sending **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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it to the vendor for complete refurbishment.

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MEMBER BONACA: Yes, but, you know, a good lay-up is credit. Bad lay-up, that's penalty. And you know, how do you deal with it? The inspection is being done to verify the lay-up conditions, because it's an issue.

7 MR. FREEMAN: Well, thus far, even though 8 as Masoud mentioned, they are really not crediting 9 lay-up towards reduced inspection requirements. Thus 10 far, the fact that it was -- that the equipment was 11 largely in lay-up condition through -and my 12 continued time table here went to about 2004 when we 13 started removing from lay-up the last of the equipment, there was 20,000 components that were in 14 15 the lay-up program up until about 2000. And then we, you know, changed the QA plan and began to reduce 16 17 that number substantially.

18 In 2004, basically, the larqe pump, 19 including the safety-related pumps and motors and a few cranes that we continue to use. 20 But while we 21 credit don't that to reduce the inspection 22 requirements we have got, it has left the equipment 23 in pretty good condition. That and, you know, the fact 24 that the systems, the components have been

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installed inside basically. The things that we have had apart have been in good condition, you know, as found.

MR. BAJESTANI: I want to just use one of the examples, let's say, the control rod drive.

MR. FREEMAN: Well, our control rod drive 6 7 system, our OEM Westinghouse came on site and 8 actually did the testing of the pull timing to make 9 sure everything is moving like it is supposed to. 10 And I think we've got really good results. They have 11 no issue at all. A boroscopic inspection did show 12 some -- a little bit of corrosion up inside, which they are advising us on, but all the mechanisms and 13 14 everything moves very well.

15 MR. BAJESTANI: We have specific phases 16 for rod-drop testing, essentially, that's really what 17 Westinghouse did.

MEMBER BONACA: 18 The reason why I raised 19 the issue is that this happened in the '80s. And the industry did not have really good guidelines for lay-20 21 up until the '90s when EPRI came up with very solid, 22 you know, base to lay-up. So anybody who was 23 involved in lay-up knew that some components were 24 short-changed by just simply there were no very good

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lay-up guidelines. So I would expect that you would check the components.

MR. FREEMAN: Well, I understand. And we are checking the components. Again, we are not really taking credit for it. I'm just mentioning it because of the --

7 MEMBER STETKAR: I guess to reinforce 8 Mario's point, it might be useful when you come back 9 for the Full Committee, rather than emphasizing the 10 fact that you haven't taken credit for lay-up in 11 terms of reducing the amount of inspections that you 12 might need to do, do you have any examples where simply because something was in lay-up you have had 13 14 to increase those inspections because you are 15 concerned about the equipment status, because it was in lay-up? 16

So not in the sense of not taking credit for lay-up to reduce the level of effort, are there any examples where concerns have been raised where, indeed, you have had to increase your level of inspection or -- and I think it would be useful, you know, to kind of allay those concerns, if there are, to kind of explain where you have looked at that.

MR. BAJESTANI: There are some specific

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examples of, I guess, poor lay-up that we know specifically on raw cooling water. Bob, just go through a little bit of detail on what we are finding on the raw cooling water.

MR. MOLL: Like over here?

MR. BAJESTANI: Yes.

7 MR. MOLL: Bob Moll, TVA, Pre-op Start-up 8 I came to Watts Bar in late 2007 and we Manager. 9 experienced some of the lay-up issues at Browns Ferry 10 when I was there not being laid-up good. So first of 11 all, one of the inspections, the boroscope inspection we did on the control rod drive mechanisms, all of 12 them, was done to confirm that the lay-up did work at 13 14 Watts Bar. We did that to make sure the lay-up was 15 good.

We spent a lot of time in late 2007 looking at the raw water systems at Watts Bar, because we had issues with bad lay-up at Browns Ferry Unit 1 on raw water systems, both safety and nonsafety-related.

What we found historically back at Watts Bar, I'm going to say I think it was probably during the first cycle of operation, the interface valves that were isolating the Unit 1 and 2 raw cooling

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water systems leaked by and they did get water in the raw cooling water system on Watts Bar Unit 2.

As a result of that, we have gone out and did, I think was somewhere around, 24 or 25 UT inspections at the interface point boundaries, both on the Unit 1 side and the Unit 2 side. We are doing -- and basically, those results came out okay. We not seeing nick are any in the piping and degradation.

10 We are currently in the process of going 11 through as we open up the raw cooling water system on 12 the Unit 2 side, we are in the process now of Essentially, we've got a game plan 13 cleaning that. laid out to clean all of the supplies to all of the 14 15 raw cooling water loads on the Unit 2 side based upon these inspections we have seen. 16

17 We have also looked on the ERCW side, 18 kind of looking at the same thing. We went and first 19 looked at the dead-legs on the unit, on the ERCW system, isolating the Unit 2 side. And actually, 20 21 those legs have all been in the Unit 1 UT Program 22 since it started up and the plant has been routinely 23 monitoring those. They are all stainless steel 24 versus carbon steel, which is what we saw in the raw

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cooling water side.

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Then the other thing we have confirmed is we have not seen any signs of any raw water getting into the Unit 2 ERCW loads. They have been adequately isolated. We have done some internal boroscope inspections during DSIP, but there has been no signs of water over there.

8 We have also opened up any -- pretty much 9 any time somebody opens up the secondary side, we 10 have been out doing inspections, my start-up group 11 has, and we have seen signs of water that got into 12 the condensate system and identified that piping as 13 it has opened up, that we need to go clean it out, 14 vacuum it. It is not near as bad as what we saw in 15 the raw cooling water side, but we are out there 16 doing those inspections as those components are 17 opened up.

18 MR. FREEMAN: Okay. I'll read, if you'll 19 bear with me. I do have a copy of a refurbishment program here and I'll read a passage from it, just so 20 21 that you'll understand what the overall objective is. 22 Refurbishment as described by the program 23 involves inspections, cleaning, testing, lubrication, 24 replacement of shelf-life limited parts, such as

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gaskets and packing and elastomers. In some cases it will be more economical to replace the whole components, rather than refurbish. Consideration will be given to specific engineering requirements, such as environmental qualification when establishing the refurbishment activities required for specific components.

8 Lessons learned for reliability issues 9 noted during Unit 1 operation will also be considered 10 when establishing those refurbishment activities for 11 those given components. So this is our starting 12 point. I mean, this doesn't need to be -- this isn't necessarily the end all, but we are taking the 13 approach you had talked about, you know, having to 14 15 think differently when you -- you know, how to these specific equipment that 16 address has been sitting around for a while. 17

18 Yes, we will inspect, I forget who said 19 it, but inspect, the bearings to be sure that there are no flat spots. We will take the components apart 20 21 and do visual inspections. We have secured vendors, 22 either the original equipment manufacturers or 23 specialty vendors, to address a lot of our large 24 components.

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So just for example, our RCP motors are back at Westinghouse to be refurbished. Our safetyrelated motors are going to the power service shop, that's a part of TVA that does the other nuclear units' motor maintenance, who largely does the motor maintenance for those operating plants. Safetyrelated pumps largely, I think, all but two of them are going to the original equipment manufacturer for refurbishment and inspection.

10 Limit torque operators, the safety-11 related operators, we found that it was cheaper to 12 replace them all with new, rather than, you know, try disassemble 13 to those and remove all the old lubrication greases and stuff that would harden over 14 15 And we negotiated a pretty good deal to bring time. new ones in for those. 16

17 A program that is supplemented by the 18 system's flush and cleanliness program will be done 19 as part of the start-up process. The component testing program where, you know, things will 20 be actuated for the first time, of course, the pre-op 21 22 test program will demonstrate that everything meets its design requirements. 23

Pre-service inspection program, which

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will go out and inspect some of the system welds and system piping. And we have some cases, other cases, you know, that has been mentioned. The safetyrelated transmitters will be replaced. The EQ components will be replaced, rather than trying to start over with those.

7 And the group is comprised of, you know, 8 some TVA veteran maintenance folks. So we are 9 getting the benefit of their experience for 10 reliability issues and those kinds of things and 11 we're taking advantage of that. Any questions on 12 that?

13 MEMBER MAYNARD: For your pressure boundary type pipes, RCS pipe, steam generators and 14 15 stuff, are you providing primarily on the flushing 16 and cleaning program or are you doing assessment to see if there has been any chemical contamination? 17 Ιf 18 this were a bad lay-up program, it can cause you more 19 problems than another lay-up program. What do you do to make sure there hasn't been some contaminants or 20 21 something that could rapidly degrade the pressure 22 boundary capabilities? RCS piping, steam generators. 23 MR. BAJESTANI: We're qoinq to be 24 replacing some of the valves in RCS. You know, I

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1	mean, there is already going to be the walk-down
2	baseline based on the application.
3	MEMBER MAYNARD: The valves and stuff.
4	MR. BAJESTANI: Right. We opened the
5	when we open the valve, we're going to look at the
6	system. We're going to look at it and see what we
7	need to do. What is the contaminant? Then based on
8	that, we decide what we're going to be doing. So
9	anyone of the units, there are quite a few valves
10	actually that are missing.
11	MEMBER MAYNARD: We can actually
12	MR. BAJESTANI: Sometimes the
13	contaminants they are not visible. We'll go to Frank
14	and see
15	MEMBER MAYNARD: Another question.
16	Something I want the NRC to take a look at.
17	MR. KOONTZ: Yes, this is Frank Koontz
18	again. One of the things we did for ASME is we had
19	Westinghouse walk-down the NSSS components and they
20	went in and they looked at the surfaces of all the
21	components for arc strikes to see if there was any
22	damage. They went down inside the vessel and looked
23	at the bottom welds down in the vessel. They looked
24	at the vessel itself.

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There was some residue in the vessel. It 1 was sampled to make sure it wasn't bad, deleterious, 2 3 you know. Sorry about that. And checked that out to make sure it was okay. We will be doing on the steam 4 5 generators a FOSAR and a sludge lansing on the secondary side to make sure it is all cleaned out. 6 7 And of course, we are doing a 100 percent eddy 8 current exam on the steam generators before we start-9 up. 10 I just -- there is --MEMBER MAYNARD: 11 you know, welds are always a sensitive area. You 12 know, anything that can accelerate pressure, the PSIG or the intergranular stress corrosion cracking or any 13 of the stress corrosion cracking phenomena. 14 15 CHAIR RAY: You said the steam generators at Unit 1 had been replaced? 16 17 MR. BAJESTANI: Yes. 18 CHAIR RAY: You expect the same thing to 19 happen on Unit 2 or is there something that will prevent that? 20 21 MR. BAJESTANI: What we have done based 22 on the inspection that we have done and based on some 23 additional work that we are going to be doing before 24 we start-up Unit 1 -- I mean, Unit 2, we expect to **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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get actually more life out of the Unit 2 steam generator than what we did on Unit 1. Specifically, we are removing all the copper from secondary site. We did not do that on Unit 1.

We are going to be doing zinc injection, which we didn't do on Unit 1. So we started up the water chemistry wasn't as good as it should have been. So there are a bunch of stuff that we have put in place to get more life out of the Unit 1 -- I mean, Unit 2 steam generators than what we did at Unit 1.

12 So far we know we're going to get from -at least from what we have done on Unit 1, we know 13 14 we're going to get about 12 years of qualified life. 15 But we expect to get more than that. We expect to 16 get more life out of the steam generator than 12 17 years.

MEMBER SIEBER: Um-hum.

MR. BAJESTANI: Okay.

Does Unit 2 have a 20 MEMBER SIEBER: 21 condensate polisher? 22 MR. BAJESTANI: Yes, yes.

SIEBER:

You will

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MEMBER

chemistry control?

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MR. BAJESTANI: Ah, we have. 1 That part 2 of it, anybody back there can answer that question? Frank? 3 4 MR. KOONTZ: Steve might be able to 5 answer that. I guess the question, Steve, was what 6 kind of chemistry controls do we do on steam 7 generator? 8 MR. SMITH: You know, they got -- this is 9 Steve again. We've got -- on Unit 1 we use -- the 10 chemistry uses pH control and injects the -- sorry, 11 can't think of all the chemicals, but keep the iron 12 under control, all the chemistry aspects for the 13 sodium sulphates, if that's what you're talking 14 about. 15 MEMBER SIEBER: Well, yeah. They try to balance the chemicals that are in there in addition 16 to maintaining pH and --17 18 MR. SMITH: Correct. 19 MEMBER SIEBER: -- conductivity, so that you don't end up -- you know, you can balance pH and 20 21 have a lot of ions in there. And the idea is to be 22 able to do the balance without having a lot of 23 chemical injections, that's called mole chemistry 24 control. Westinghouse has used it for years. So I'm **NEAL R. GROSS** 

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sure if there's a problem --

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2 MR. SMITH: We do have a molar ratio 3 thing that we're talking about.

MEMBER SIEBER: Right.

MR. SMITH: Yes, sir, we do. We do have that on our chemistry page where we monitor molar ratio and maintain it within a band.

8 MEMBER SIEBER: Has anybody taken 9 boroscope and looked at the tube sheet in the steam 10 generators? Like welding rod fits and stuff like 11 that.

MR. BAJESTANI: We have -- actually in modification that is coming up on steam generator that we're going to have to do that. We are modifying the drains and the -- so we have to get there and we're going to have to look at that, at that time.

18 MEMBER SIEBER: Yeah, that's a good thing 19 to do. You know, every once in a while you find a 20 welding rod in there.

MR. BAJESTANI: Right.

22 MEMBER SIEBER: Do you have a blow-down 23 system?

MR. BAJESTANI: That we do, yes.

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MEMBER SIEBER: Okay. 1 MR. BAJESTANI: A steam generator blow-2 3 down, yes. 4 MEMBER SIEBER: Sometimes when they put 5 them in the condensate polisher, they say you can save money with that by not putting it in and you 6 7 find out you can never get it into specs, because the 8 polisher won't do it by itself. 9 MR. BAJESTANI: We make sure under future 10 meetings that we discuss the chemistry in a little 11 bit more detail. 12 MEMBER SIEBER: Okay. MR. KOONTZ: Yeah, I can probably add a 13 14 little bit. This is Frank again. But, Steve, we 15 normally run on steam generator blow-down. We don't 16 use the condensate polishers at Watts Bar on Unit 1. 17 MR. SMITH: Yeah, on the start-up. 18 MR. KOONTZ: So they keep the chemistry 19 very clean on the blow-down system. And as far as the --20 21 MEMBER SIEBER: It's got a pretty good 22 capacity, I take it, for blow-downs? 23 MR. KOONTZ: Blow-downs, yes. 24 MEMBER SIEBER: Not just a blow-down in **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

238 1 name only. MR. KOONTZ: Right. Chemistry monitors 2 3 that and then if there is anything that needs to be 4 done, they install -- you know, they will put a 5 polisher in to take care of it. MEMBER SIEBER: Okay. 6 7 MR. KOONTZ: On the weld rod, we, as I 8 mentioned, will be doing the hydrolasing and the 9 foreign object search and retrieval for the 10 generators. 11 MEMBER SIEBER: Hydrolasing is sort of a Because I wouldn't expect a lot of stuff 12 surprise? On the other hand, parts and junk from the 13 in there. manufacturer sometimes shows up unexpectedly. 14 15 MR. BAJESTANI: Yes. 16 MR. KOONTZ: I have seen some of that. 17 MEMBER SIEBER: Okay. 18 CHAIR RAY: Okay. Are we in to the differences discussion here? 19 20 MR. FREEMAN: Yes. 21 CHAIR RAY: Go ahead. 22 MR. FREEMAN: I am --CHAIR RAY: Unit differences. 23 You are 24 done with --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com MR. FREEMAN: Yes, that's fine. The next slide shows the unit differences. The approach that we are taking. We are committed to reducing those differences, so that, at a minimal level, basically, that bullet in the middle there that talks about dual operator licenses, that that is not required.

7 The procedures require us to identify 8 those operational and maintenance differences through 9 the Unit 1 staff, so that training can be prepared to administer, you know, well in advance of it becoming 10 11 necessary to the installation being done. But in 12 cases where, you know, equipment is -- you know, it needs to be different because of obsolescence or the 13 technology has advanced and it would be a good thing 14 15 to put in the new stuff.

16 The objective is to make it look and feel, to select and specify equipment that looks and 17 18 feels and responds to the operator the same way that 19 the Unit 1 equipment does. And even though it may be, you know, the controller itself, it might have a 20 21 push button instead of a toggle kind of switch, when 22 the operator touches it, it will respond the same 23 way.

The fidelity between the two units, you

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know, is something that we are paying close attention to, so if the plant has a specific reaction, we want that licensed operator, whichever unit that it is, to pull the same procedure, to respond to the same action steps and for the plant to respond to him the same way.

MEMBER SIEBER: Yeah, one thing I found important for dual units is location of the instruments and the controls on the board are in the same position.

MR. FREEMAN: Well, we're going throughthe CR.

MEMBER SIEBER: Not reversed, not over here on the unit and down here on another. I mean, that makes a big difference, because operators are under a lot of pressure in accident situations. And while they think and they look, they also move by instinct and feel.

19 MR. FREEMAN: You are exactly right.

20 MEMBER SIEBER: And always think of when 21 you are doing your control room design and human 22 factors, always think of your worst operator and for 23 that guy.

MR. FREEMAN: Okay.

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1 Would there be CHAIR RAY: separate 2 simulators? 3 MR. FREEMAN: Pardon? 4 CHAIR RAY: Will there be separate --5 MR. FREEMAN: No. CHAIR RAY: -- simulators? 6 7 MR. FREEMAN: Unit 1 will be the unit of 8 record for our simulator and we will train on the 9 differences between the two units. Steve was wanting 10 to comment on the CRDR and that's --11 MR. HILMES: Yes, Steve Hilmes with 12 Electrical I&C. We have been very careful we keep 13 the instruments, no matter what, up. As mentioned, the controller may look somewhat different, but we 14 15 have tried to standardize the controller, so there 16 isn't much learning there, that they understand them. 17 MEMBER SIEBER: The biggest factor is 18 position. 19 MR. HILMES: Yes. And everything will be 20 in the same position. 21 So we are striving for that MR. FREEMAN: 22 and those differences that do exist again, we're 23 making sure that the Unit 1 staff is aware of those 24 and training is administered as it must be. There is **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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a couple of -- I'm sorry.

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MEMBER STETKAR: You mentioned, this came up, I used to be an operator, the -- what is the protection system on Watts Bar Unit 1? You mentioned Unit 2 is going to be Eagle 21.

> MR. FREEMAN: It's Eagle 21. MEMBER STETKAR: It is Eagle 21.

MR. FREEMAN: Yes.

MEMBER STETKAR: Okay.

10 MR. BAJESTANI: Identical.

11 MEMBER STETKAR: Fine.

MR. BAJESTANI: Right.

And I think Mr. Hilmes 13 MR. FREEMAN: mentioned the control systems earlier. 14 And even 15 though that engine is going to be, you know, different down in the office instrument room, the, 16 other than the controller differences that he has 17 mentioned, control room will still be laid out the 18 19 And again, we are striving for the same same. response and same feel in the Unit 2 side. 20

There is a couple of systems that are mentioned there that we are installing the new technology. Steven mentioned the RVLIS system, that's Reactor Vessel Level Indication System or

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Inadequate Core Cooling Monitor System. We are installing Westinghouse's new Common Q System. It will look a little different. It is -- I think it's a touch screen instead of the old LED screens and push buttons and stuff, but it will be laid out similar to where the operator can navigate through it using similar hand actions.

MEMBER SIEBER: Hopefully, you won't use RVLIS very often.

10 We are against that. MR. FREEMAN: Yes. 11 And another difference is we are installing the 12 Common Q System instead of the old traveling, the traversing in-core probe system. It's a fixed probe 13 That's used primarily by the reactor 14 system. 15 engineering, so the operator interface with that will 16 be less, but it is new technology that we are putting 17 in. 18 MEMBER SIEBER: Are you going to have 19 digital rod position indication? 20 MR. HILMES: Yes. Steve Hilmes. Yes, we will. 21

MEMBER SIEBER: In Unit 1?

23 MR. HILMES: We already have it in Unit
24 1. We will have the same system.

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It solves a bunch 1 MEMBER SIEBER: of 2 problems? 3 MR. HILMES: Yes. 4 MEMBER SIEBER: Okay. 5 MR. FREEMAN: Ι have completed my 6 material. Any other questions? 7 CHAIR RAY: Well, that's good timing-8 It works for us. Let's see, this is our last wise. 9 chance to, in this session anyway, direct questions 10 to the applicant. And we have got a few minutes, so 11 anybody who has a question, please, pursue it. 12 MEMBER STETKAR: Does -- I'm not familiar enough and this is again the danger of ending too 13 Does some of the new I&C stuff use fiber optic 14 soon. 15 cables so you are into different cable pulling and stuff? 16 17 MR. HILMES: Again, this is Steve Hilmes. 18 Yes, it does. For example, the rod position system 19 uses fibers. The BLP controls will have fiber, will all be fiber. We have quite a bit of experience with 20 21 routing fiber, especially at Browns Ferry. We have 22 done quite a bit. We have had a number of lessons 23 learned along those areas, but yes, it --24 MEMBER STETKAR: I was just curious, **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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245 1 because, you know, the word cable and Watts Bar are two words that --2 3 MR. HILMES: Yes. Our current 4 specifications for installing cable does address the 5 fiber optics. We test the fibers as far as 6 diminishing signal, all those types of things. 7 MEMBER SIEBER: I understand the hard 8 part is terminations. 9 MR. HILMES: It's not as bad as it used 10 They have gotten a lot better. And what we to be. 11 have -- one of the MEMBER SIEBER: It was hands-on for a 12 while. 13 MR. HILMES: One of the lessons learned, 14 15 learned at Ferry, is we Browns we have а telecommunications group and they make it a whole lot 16 I mean, they can -- you see a lot less 17 easier. 18 problems when they do the installation. 19 MEMBER SIEBER: They did ours, too. 20 MR. HILMES: Yes. 21 MEMBER STETKAR: Thank you. 22 CHAIR RAY: Anything else? Okay. 23 MR. KOONTZ: This is Frank Koontz again. had one open item from this morning. 24 Ι Someone **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

questioned what the NSIP was for the diesel generators. I did verify with my counterpart on Unit 1.

CHAIR RAY: MSPI.

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MR. KOONTZ: MSPI, I'm sorry, MSPI. That it is green for the diesels and has always been green.

8 Okay. Let me --CHAIR RAY: Thank you. 9 we will take our break 15 minutes early, but before 10 we do that, let me say for the applicant and also for 11 the staff who will be coming back after the break, 12 that the time on the agenda shown as Subcommittee deliberations will be a time at which we will be 13 talking about whether we understand what the purpose 14 15 of a letter would be, should we write one, I've got the Chairman on my left, the Vice Chairman on my 16 right, for the Full Committee, so I'll get a lot of 17 18 help in trying to work to a conclusion there.

But I -- and I think primarily this is a dialogue that would perhaps engage us with the staff. I take it that the applicant doesn't have any craving for a letter from the ACRS, at this point in time. Am I correct?

MR. BAJESTANI: I don't think so. At

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least from our side of it, no.

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CHAIR RAY: All right. Well, I just 2 wanted to say that if you hear us, if you stick 3 4 around and hear us discussing this, we are going to 5 be trying to come to some conclusion here, because 6 although we have a lot interest you heard them 7 expressed here, what we need to focus back on is 8 well, all right, what is it that we would opine on, 9 if anything, at this stage of the game? 10 We haven't come to a conclusion about 11 that, but we will. Okay. With that, we will take a 12 15 minute break and resume at a little after 12:45. 13 (Whereupon, at 2:30 p.m. a recess until 14 2:57 p.m.)

15 CHAIR RAY: Okay. The hour of 3:0016 having near enough arrived, we'll resume. Bob?

17 Good afternoon. MR. HAAG: My name is 18 Bob Haaq. I'm the branch chief with the NRC's Region 19 II Office in Atlanta Georgia. And my branch is implementation 2 20 responsible for of Watts Bar 21 Construction Inspection Program.

22 Several items that were brought up 23 earlier this morning, as far as questions, I have 24 captured and I plan on talking about later on. But I

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wanted to get through a couple of slides and kind of just give you the overall structure of the inspection program and kind of how the region is organized as far as the inspection program.

5 This slide right here depicts the 6 traditional Construction Inspection Program that has 7 been implemented for Watts Bar Unit 1 and all 8 previous operating sites. It includes, you know, the 9 three major programs: 25.12, 13 and 14. And each of 10 those have a large number of individual inspection 11 procedures that have to be done to be able to say 12 that aspect of the construction inspection program is finished before we proceed on the next one. 13

14 And ultimately, what has happened is once 15 completed all our inspections and have we are satisfied that the plant is properly built, 16 the regional administrator would make a recommendation to 17 the Direct of NRR as far as issuance of a license. 18 19 So that's the expectation as far as how we would proceed with this one. 20

Clearly though, it's recognized and it was brought up earlier today, there is a number of unique situations and the history of Watts Bar Unit 2 dictate that we do more than traditional construction

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inspection programs. And I'll try to talk about those, some of the activities that we have got planned. And what you will hear mostly will be what our plans are.

You will see as far as our implementation inspections, have done worth of we а years inspections, but we're just starting our real inspection program. Likewise, TVA is really just starting their construction as far as safety-related work in the area that will have an emphasis on.

11 The next. slide deals with our 12 construction organization. We fall under the new organization that was developed in Region II a couple 13 of years ago that was intended for new reactors. 14 15 When Watts Bar 2 came along, it was decided that it 16 would be a good fit to put my group within that division and use the resources from the division as 17 18 far as the engineering needs, the specialty needs for several reasons. 19

20 One of the reasons is we didn't want to 21 impact the inspection program or the operating sites. 22 We wanted to minimize on our tests there. And we 23 wanted to get an opportunity of developing the new 24 inspectors for the construction inspection program

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utilizing them at Watts Bar, gaining them experience when doing construction inspections.

As far as the -- my branch, it falls under the Division of Construction Inspection. My branch is solely responsible for Unit 2. We have no other responsibilities or duties. My organization is broken down into the site inspectors, resident inspectors and I've got regional inspectors that report directly to me.

10 As far as the resident inspectors, we've 11 got a senior resident inspector and two resident 12 They have been in place for a little inspectors. year doing inspections, following 13 TVA's over а activities. For 2008, we did a number of inspections 14 15 and I'll discuss those later on.

Within 16 the region, have got we individuals solely responsible for inspecting Watts 17 18 Bar Unit 2. They fall within my branch. I have got 19 senior project inspector and two project inspectors. 20 And then we have got the other organization, 21 Division of Construction Inspection.

And I'm not sure if you are familiar with the way a region typically is organized, but you will have divisional reactor projects, DRP, who handle the

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then you have got a division of reactor safety, DRS, who have the specialized areas, the welding engineers, fire protection, people like that.

And the construction organization is similarly organized where we will pull on those expertise to provide inspections in the areas that might -- may not have those capabilities.

9 As far as staffing, one of the items I 10 wanted to mention, right now our staffing level is 10 11 My branch takes about 4 -- excuse me, about 6 FTE. 12 FTE and we rely on the remaining 4 FTE to provide specialized inspections 13 those from Division of 14 Construction Inspection.

15 We will be looking at staffing at the site and with the possibility of increasing reg 16 inspector by one. We will be looking at that later 17 18 this summer. We have got a placeholder where once we better understand the level of on-site construction, 19 how that fits as far as whether it is better suited 20 21 for a resident inspector or a regional inspector. We will make that decision then. And if we do decide to 22 23 have another res inspector, the goal is to have them 24 there before the end of the year.

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MEMBER ABDEL-KHALIK: Do you believe the staffing levels are appropriate, adequate?

For what we have been able to MR. HAAG: develop so far, as far as the scope of our inspections, you know, what we need to do, I believe they are adequate. And certainly with the level of activities that have been formed to date, we have had adequate resources to be able to cover those as our program depicts.

10 And keep in mind, a lot of our effort has 11 been towards developing the inspection program. We 12 the existing program, 25.12, 13 took and 14, understood what those requirements are, but added in 13 all these other additional considerations to develop 14 15 what our inspections ought to be. So a lot of our 16 time this past 18 months has been developing, 17 defining the scope of our inspections.

I want to pause here and go over a couple of items that you had mentioned you have an interest in. Really it's the status of Unit 2 during the time period of 1980 to 2007, what was going on there with the systems, particularly, what we were doing as far as our inspections.

We have an inspection that is required

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for plants in a deferred status. There is an inspection procedure that is laid out for there. We were doing those either once or twice a year. And it looked at the typical things you would expect, you know. It samples their preventive maintenance programs. It looks at their corrective action program, QA programs, things like that.

8 So we were doing those inspections up 9 until TVA decided to go ahead and reactivate 10 construction. I don't have all the -- I'm not going 11 to provide all the details on that, but we did 12 identify some problems. There were some violations. But for the most part, we felt like TVA was doing a 13 good job in implementing their program within the 14 requirements that we had set forth. 15

16 Once they decided to reactivate Commission 17 construction, the Policy Statement 18 requires certain things that we need to look at to 19 kind of give a baseline of where the project is to be able to look forward to what our inspections are. 20 21 And one of the things that it requires inspection is 22 look at the lay-up program, the preventive to 23 instrument program and see how effective that has been to decide what level of activity needs to be 24

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performed for future.

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And when we did a readiness inspection 2 earlier in 2008, and I'll allude to the reasons why 3 4 we did a readiness inspection, but part of that was 5 to fulfill that requirement of the Commission Policy Statement. We looked at, you know, historically what 6 7 their lay-up and preventive-maintenance programs 8 were. We discussed in our inspection report how that 9 program was initially set up. And later on in the 10 early 2000s, as Masoud mentioned, you know, they had 11 stopped -- the essentially stopped most of those 12 programs.

So once it got to mid-2000, there were 13 14 very few lay-up and preventive-maintenance 15 We documented then our inspection report activities. 16 and that goes towards our belief that the program for refurbishment is a critical point or critical aspect 17 18 of what TVA needs to do and what we need to inspect. 19 And I would characterize it as that is one of the 20 other areas that our inspection program doesn't 21 dictate us to do, but we clearly understand that's a 22 necessity.

23 MEMBER ABDEL-KHALIK: Now, the plant was 24 put in a deferred status and they stopped these lay-

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255 1 Have your inspections continued at the up programs. same frequency? 2 3 As I said, yeah, earlier, we MR. HAAG: 4 were doing them either once or twice а year, 5 depending upon the intervals. We didn't have it set 6 it had to be done every nine months. 7 MEMBER ABDEL-KHALIK: And despite the 8 fact that these lay-up programs were terminated, your 9 periodic inspections did not reveal anything of 10 concern? 11 MR. HAAG: Well, it -- our inspection, 12 when you go back and look at it, it recognized they 13 followed their process as far as changing their 14 Quality Assurance Program to allow them to do that. 15 I mean, that's within our regulations, they can do So I mean, it wasn't like that was a violation 16 that. regulatory 17 that they meeting were not our 18 requirements. It's an acknowledgement that they made 19 the decision to stop those programs. 20 And far as future inspections, as 21 clearly, as I talked about, you know, we will be 22 looking at the refurbishment program. We have looked 23 at their initial procedure they developed that gives

the broad umbrella on how they plan to do

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refurbishment. We have provided comments. There were some areas that we felt like that the plan could be improved. Passive systems, it had very limited information, discussion on passive systems.

So we provided that information to TVA, as far as, you know, our review, you know, your umbrella program really doesn't provide a lot of guidance to implement this refurbishment program. And they put that item in their corrective action program.

11 You mentioned Appendix В and implementation of that in what we are looking at as 12 far as Appendix B, quality assurance. If you go back 13 and take a look at 25.12, there is a number of 14 15 inspection procedures at 25.12 that deal with quality assurance looking at the program -- looking at the QA 16 manual and several other areas. 17

18 So my answer to you as far as how we are 19 qoinq to inspect and verify the actual quality assurance program is by implementing those inspection 20 21 procedures in 25.12. And we have taken the decision 22 to complete those totally. We are not going to try 23 to rely on previous inspections to say, you know, 24 they had adequately implemented quality assurance

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programs. For the recognition, this is a new program that Bechtel here are working on. So we felt like we needed to do those procedures completely.

CHAIR RAY: Well, let's take something like concrete or cad welds or something of that kind, it's history.

MR. HAAG: Um-hum.

8 The only thing you have is CHAIR RAY: 9 the QA records, the testing that was done of the 10 concrete when it was poured and the rebar was being 11 welded and so on. You have to -- I guess the 12 is your attitude toward question is what those 13 records? Those records are all you've got.

14 MR. HAAG: Yeah, yeah. On that specific 15 example, and I'm jumping a little ahead in this explanation, but I'll provide it for you. 16 Part of our effort to look at what we have done as far as our 17 18 inspection record, you know, for example concrete. 19 We have got a series of inspection procedures that we had that we need to implement for concrete placement. 20 21 back and looked We went at what

inspections were done historically. How did those inspections satisfy the inspection requirements of the individual IPs? So we have done that baselining.

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We are also going to look at the -- there is a corrective action program dealing with concrete. We will make sure that that is properly done to ensure any of the historical issues dealing with concrete were satisfied.

That's kind of our strategy in looking at 6 7 the historical records to -- for an area that is 8 essentially complete. Concrete is a very qood 9 example where there will be very little future work 10 So how are we going to be able to on concrete. 11 satisfy ourselves, you know, in 2010, 2011 that the 12 inspection program was satisfactorily performed? 13 That's kind of our strategy.

14 CHAIR RAY: Okay. It's got to parts 15 One is reviewing the record of what was done then. then and also whatever the corrective action program 16 17 had to say on the subject, I guess. So that if, for 18 example, I'm making this up, but, there were some deficient conditions that needed to be addressed, you 19 would make sure that those were addressed? 20

MR. HAAG: Yes.

22 CHAIR RAY: I don't know what those 23 deficient conditions would be, but --

MR. HAAG: Yeah. There was a per section

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program to address an area. Clearly, if there was some work that needed to be done, we would inspection those areas to make sure they were done satisfactorily.

CHAIR RAY: Well, it might involve calculations to show that the concrete was okay, even though it wasn't what was originally specified. Again, I'm making up an example. But that would be the kind of thing you would have to do.

10 As far as our MR. HAAG: inspection CAPs and SPs and that was 11 verification, correct. 12 another area that came out this morning as far as to 13 what we want to look at and that's just а continuation of this discussion 14 we are having. 15 Earlier there is а temporary instruction that requires us to look at each CAP and Special Program 16 as far as performing an inspection and being able to 17 18 satisfy the inspection requirements and saying that 19 CAP and SP are properly implemented.

20 So that's programmatically what is 21 requiring us to do those inspections.

22 MEMBER ABDEL-KHALIK: Now, your 23 inspection -- you used the word these CAPs and SPs 24 had been properly implemented. Does your inspection

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1 also address the adequacy of these with regard to the change in the initial condition of the plant? 2 3 We talked about earlier, you MR. HAAG: 4 know, the adequacy of the CAP and SP as being as it 5 was submitted by TVA to the staff for the staff to look at the adequacy of the program. You know, is 6 7 the program acceptable? And that's more our function 8 deciding as far as whether the program 9 programmatically it will address the issue. We're 10 focusing on implementation. 11 MEMBER ABDEL-KHALIK: But as far as you 12 know, none of these has changed where all of these 13 had been ruled to be adequate? With the exception of ones 14 MR. MILANO: 15 talked about this that morning. Yes, the we 16 remaining ones we agreed with that programmatically 17 they were fine. Now, our approach to looking 18 MR. HAAG: 19 at these CAPs will not be just going straight looking at what, you know, TVA has submitted. 20 What we will 21 do is we will have several phases. We will go back 22 and, you know, we will have an inspector assigned to 23 a CAP or an SP and they will be responsible for 24 ensuring those inspections are done. They will

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review the historical aspects, as far as, you know, what was done on Unit 1? What did we do as far as our inspection? What were our sample sizes? How do we document inspection report?

We will develop an inspection plan. You know, that will be reviewed and approved by regional management as far as what is going to be the scope of our inspections for the effort on Unit 2? And we will take any additional guidance from temporary instruction and ensure that is properly incorporated into that plan and go out and implement that plan.

And it will be typical NRC inspection sampling. You know, we will do a sampling aspect. We're not going to do 100 percent review.

Oh, excuse me. But getting back to the slides right here, I wanted to go over kind of the program development and our approaching the construction inspection program.

19 We developed an inspection manual, Chapter 25.17, with the recognition that 20 we are 21 taking this existing program that is historical in 22 nature, manual chapters, the individual inspection 23 procedures, the last time they were done was in the 24 mid-1990s. The majority of it was done way earlier

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for earlier plants.

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We made the decision, we collectively the NRC, 3 going upgrade that we weren't to those 4 individual manual chapters and those individual 5 inspection procedures without current guidance and current perspective on do 6 our how want to we 7 business. We would develop kind of this overarching 8 manual chapter that addressed areas that we wanted to do differently and provide guidance to the inspection 9 staff on how to do business. 10

11 And example are probably the best way for 12 me to explain why we need to do that. Our assessment process when you look at 25.12, 13 and 14, talk about 13 We clearly don't want to do 14 the cell process. 15 assessments using cell process. So we had to devise a new method for assessing performance. That's laid 16 17 out in the new manual, Chapter 25.17.

18 How we are going to write inspection 19 reports. Our old guidance is guestionable as far as do we -- is that the way we want to do business today 20 21 on writing construction inspection reports? So we 22 provided quidance in the manual chapter the to 23 inspectors on how to write inspection reports. There are a number of areas like that where we felt we 24

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they are using, at times outdated guidance, as far as the individual inspection procedures in the manual chapters.

MEMBER STETKAR: Bob, is this chapter -you mentioned earlier the specific sensitivity to the refurbishment. Does this chapter specifically address guidance within that regime?

9 MR. HAAG: No, no. It's -10 MEMBER STETKAR: Okay.
11 MR. HAAG: -- more program guidance.
12 MEMBER STETKAR: More program, okay.

MR. HAAG: Like how we conduct business.

MEMBER STETKAR: Okay.

15 MR. HAAG: And things of that --

MEMBER STETKAR: I was just curious.

17 MR. HAAG: Yeah. Now, we have for 18 several of these unique situations that we are going to go back and look at historical allegations, where 19 20 we want back and look generic to go at 21 communications, where the program guidance really 22 didn't give the staff an understanding of how to do 23 that. We have developed internal guidance within the 24 region for consistency.

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MEMBER ABDEL-KHALIK: So 25.17 is, essentially, a supplement to 25.12, 13 and 14? Is that correct?

MR. HAAG: You could look at it like that. It certainly provides the staff direction on how we want to conduct inspections at Watts Bar Unit 2 where 12, 13 and 14 are generic. You know, they can be -- they would be implemented any time, 25.17 specifically for Watts Bar Unit 2.

11 MEMBER ABDEL-KHALIK: But. let's take 12 something like 25.14. You have a unit that has been in operation for a long time. You have a unit that 13 14 was been idle or, you know, set aside for a long time 15 and is going to be completed after 25 or 30 years. 16 There are a lot of common systems. Is there anything 25.14 that would or does the instruction 17 in or 18 quidance in 25.14 address these unique aspects that 19 pertain to Watts Bar?

20 MR. HAAG: No. 25.14, remember we 21 decided not to go back and update those. So if there 22 -- if we do have guidance to the staff, it would be 23 in 25.17. As far as start-up testing, I would have 24 to go back and take a look specifically if we talk

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about, you know, again, the timing, the plant has been idle for that long. I mean, it's not new though that we would do start-up testing for a unit -- a second unit. I mean, that has been gone through a number of times.

MEMBER ABDEL-KHALIK: Right. You know, a plant that has been idle for a long time coupled with the fact that you have a lot of shared-systems --

9 MR. HAAG: There are certain unique considerations that we will have to take into account 10 11 when we do that inspection program. And we will have 12 to decide, you know, in those situation do we need to Is it something that we can develop 13 revise 25.17? guidance within the region for our inspectors? 14 Would 15 regional management file for -- you know, we will have to make those decisions as we get --16

17 MEMBER ABDEL-KHALIK: So 25.17 is still 18 sort of in the evolution stage? It hasn't been 19 finalized.

20 MR. HAAG: It's an existing chapter that 21 day-to-day basis for we use on а doing our 22 construction inspection. We have identified some 23 areas that we want to revise and we have got a 24 proposed change in the works for that. What we did

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on 25.12, we had the concept that we needed to have this bridge and old guidance that really didn't reflect current practices, so we were going to develop the manual chapter.

We had insights from Browns Ferry Unit 1. And we issued this thing a year ago. Even before we started, you know, this was all part of the developing understanding what we wanted to do. And certainly changes may need to be made in the future or we may need to supplement in a different way. Okay.

12 MEMBER BROWN: I guess I didn't really -so you have done 25.17 because other procedures or 13 14 inspections were outdated? I mean, you used those 15 words before. And therefore, you didn't want to change the outdated stuff, you would just write some 16 And I guess I kind of lost the bubble, 17 new stuff. 18 why do I want to have -- why are they outdated, 19 number one? I mean, I don't know anything about the So that question raised 20 inspection table. Okay. 21 itself.

And if that's the case, why write a bunch of modifications as opposed to just updating 25.12 or wherever these outdated inspection requirements --

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267 1 don't you use them or do you never use them any more? 2 Is that the case? 3 MR. HAAG: The thought was this would be 4 the last plant we would be inspecting and licensing 5 under Part 50 at one time, you know, usage. And the 6 level of effort to go back and revise all of those 7 other documents versus developing a new manual 8 chapter, it was decided, at that time, to develop a 9 new manual chapter. 10 But did you still MEMBER BROWN: Okay. 11 use some of the methods or whatever you had 12 documented or is it all new? I mean, is 25.17 brand Is it complete in itself or does it draw on the 13 new? 14 previous? 15 MR. HAAG: We are still implementing 16 those other programs. We are implementing 25.12. 25.12 is a series of inspections that need to be done 17 18 to say you have satisfactorily -- you set those 19 instructions. 20 You said those MEMBER BROWN: were 21 outdated. 22 MR. HAAG: They are outdated. They had 23 some outdated guidance. 24 MEMBER BROWN: Okay. All right. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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268 1 MEMBER MAYNARD: 25.17, basically, takes 2 those outdated parts and provides you with a method 3 to that. How do you address that area? 4 MR. HAAG: Provides the staff with 5 current guidance and reflection on how we want to do 6 business. 7 MEMBER BROWN: All right. I quit. 8 That's fine. 9 MR. HAAG: I mean, for example, when you take a look at 25.12, there is over 60 inspection 10 11 procedures referenced in there. I mean, we didn't 12 want to take the effort to revise 60 inspection procedures for one time use. And for the most part, 13 that guidance is still good. I'm not saying, you 14 15 know, all the guidance is outdated. 16 MEMBER BROWN: I understand the thought 17 process. 18 MR. HAAG: Okay. 19 MEMBER STETKAR: Bob, haven't you developed the inspection manual for the new plants 20 21 coming down the pipe yet, have you? 22 MR. HAAG: That's --23 MEMBER STETKAR: Is that a completely 24 separate --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	MR. HAAG: That's completely another part
2	by NRO and the Region II Construction Program, yes.
3	MEMBER STETKAR: Okay. But that's over
4	in the Region II Construction Program side of it?
5	MR. HAAG: Yes, and NRO.
6	MEMBER STETKAR: Okay. Thank you.
7	MS. BANERJEE: This is Maitri Banerjee.
8	Bob, are you going to address the elements of the
9	Commission policy on deferred plans? I thought there
10	was some interest in that from the Committee. Like
11	the maintenance of QA records, like I think Harold
12	asked you a question in that area.
13	MR. HAAG: Yeah. Um, there is a CAP on
14	quality records. We will be looking at that, if it's
15	available, to ensure the aspect of quality of QA
16	records as we implement our inspection procedures.
17	You know, they have aspects of records reviewed, so
18	we will be reviewing the quality assurance records as
19	part of our routine inspections for the construction
20	program.
21	CHAIR RAY: Well, okay. I guess it just
22	seems like on the one hand there is a lot of activity
23	taking place. There is a critical path schedule
24	you're trying to accelerate it and so on. And yet,
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5 But you know, TVA talked about having 100 engineers go out and verify what the plant conditions 6 7 were before they then proceeded to do -- launch their 8 program and do what they are doing. I guess what we 9 are asking about in terms of these records and what 10 we are trying to get at is are we satisfied that they 11 are an adequate basis? There is a corrective action 12 program that has to be implemented by them. You are taking a look at that. Is it being done timely, do 13 you think, relative to the implications that it has? 14

15 MR. HAAG: As far as the timing of that, 16 I mean, clearly certain aspects for the CAPs have to 17 completed before we would and do be go our 18 inspections. So we are monitoring TVA's schedule as 19 far as those milestones and when they will have certain activities done, so we can go in and sample 20 21 or the CAPs and SPs that actually have physical work, 22 when those take place we can get out in the field. 23 Well, just focus on the QA CHAIR RAY:

records.

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The QA records? Clearly, we 1 MR. HAAG: 2 well have to go in and do a sample of QA records. We have already done some limited review of QA records 3 4 as part of the inspections that we have been doing in 5 2008. We have looked at some of the weld records and things like that. So we have done some review. We 6 7 have put our hands on some QA records, but we are not 8 at a point where, you know, we're saying we have 9 satisfied that particular CAP or are we necessarily 10 satisfied the individual inspection procedures that 11 are called out where you go and look at the quality 12 the records and make sure those records of are 13 satisfactory. Well, if you were in our 14 CHAIR RAY: 15 shoes and imaging that what we are trying -- one of the things we are trying to do here is come to a

16 the things we are trying to do here is come to a 17 conclusion as to whether or not the Commission's 18 direction is being -- whether we had any comments on 19 its implementation. It would be hard to make a 20 judgment about that particular point, for example, 21 given what we --

22 MR. HAAG: It's more is your development 23 to date, does it make sense. Clearly, implementation 24 has yet to be proven as far as us going out and

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saying we have inspected this.

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CHAIR RAY: Um-hum.

MR. HAAG: Or we are satisfied that that activity is properly implemented.

5 CHAIR RAY: Well, there does arise the 6 question of, I guess, timeliness or are we going to 7 do things in a sequence in which they logically 8 should be done in order to be effective. And it's a 9 hard thing to answer when most of the issues are 10 answered in the way that they are. Because it's hard 11 for us to link up what's going on. Obviously, the 12 train has left the station on its way to the next station and -- well, I have said enough. Why don't 13 14 you go ahead.

MR. GIITTER: Can I just interject for a second? This is Joe Giitter. I just wanted to reemphasize that we are very much at a starting point here. And we really are here to, number one, inform you of the process that we are following, both in terms of licensing and construction inspection.

CHAIR RAY: Um-hum.

22 MR. GIITTER: And we feel it is important 23 to engage you now, rather than later on. And we 24 really -- you know, we are doing this because we want

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to. You know, we would like a letter from you. It's not absolutely necessary. But you know, as an independent body, we are hopeful anyway that you would endorse the approach that we are taking.

And we plan to come back and meet with you on a regular basis. And Pat is going to talk about that later on. But again, we think this is an important first step. There is obviously a lot of work that still has to be done. There is a lot of implementation, a lot of construction inspection, a lot of licensing work.

We believe we are at the very beginningstages of this for the most part.

Well, okay. Let me though 14 CHAIR RAY: 15 take advantage of your having opened up that point. Let's see, it's now almost April, which means that 16 five months ago this office instruction LIC-110 came 17 I asked earlier today about the reactivation 18 out. 19 assessment group and I understand there is a draft charter being reviewed. 20

MR. GIITTER: That's correct.

CHAIR RAY: There is also something that says independent design verification program. This group for which we just now have a draft charter will

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recommend whether or not an independent design verification program by the staff is required to independently verify the key aspects of the plant have been designed properly.

You know, I just really wonder whether or not, when we get around to that, it's going to be timely. So if you want me to write a letter, which isn't going to happen, but if that were to be the case, I mean, that would be the kind of thing I would express concern about is well, when are you going to do these things?

Because it seems to me like there is a 12 lot already underway here that if you are talking 13 about independent design verification, my God, that's 14 15 something that the longer you go before doing it and it takes a while to do for sure depending on what you 16 are talking about doing, and it has to be done by the 17 18 applicant, I did note that there was something about independent review, but it didn't constitute a design 19 verification program, I didn't think. 20 And I asked 21 about who is responsible for the design and I heard 22 the answer to that.

But anyway, I digress. The point is that timeliness becomes a part of what it seems like we

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would have a comment on, but it's hard to be sure given the information that we have. One would just think when you hear the applicant describe his program and what he is doing and when he is going to be getting to various milestones and then you 6 determine that, at this point in time, that's something that a group that doesn't yet exist is 8 supposed to make a recommendation about. It just doesn't seem like the things correlate very well. Go ahead.

11 MR. HAAG: Getting back to this, I wanted 12 little about to go over а our strategy on implementing the construction inspection programs in 13 I talked a little about the reconstitution, 14 25.12. 15 that's what I call Phase 1, where we went back and we looked at, you know, the inspection record. 16 And we have completed those for the applicable inspection 17 18 procedures that we felt needed to be reconstituted.

19 There some that weren't are reconstituted, because they were not 20 applicable. 21 There are some inspection procedures in 25.12 that 22 talk about doing inspection exits with the licensee 23 and it really is not something dealing with 24 inspecting the plant, per se. So we didn't -- there

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is a small group of those.

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We also didn't reconstitute the inspection procedures that talk about reviewing their implementing procedures as far as procedures that TVA would be using for constructing the plant. Now, before you go too far there, let me give you the rationale.

8 All of the inspection procedures in 25.12 were reconstituted for Unit 1. 9 And our thought 10 process there was for the inspection procedures that 11 dictate the staff go out and look at implementing 12 judge the quality of implemented procedures and procedures. How well you install or how you install 13 cables, how you place rebar, things like that. 14

15 All those inspection procedures were complete for Unit 1. And that did the historical 16 17 look back at construction up to 1990. So those 18 things have already been inspected. Our strategy 19 going forward for any new work will be implementing those inspection procedures where we will be looking 20 21 at how TVA is going to install supports, their 22 welding procedures, their NDE procedures. So we will 23 be inspecting those. So that was another group that 24 we didn't reconstitute.

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The results of that reconstitution was a status of the inspection procedures in 25.12. We're going to look at the scope of new work. We're going to look at the other areas that we said that we need to inspect and we will take that information and look back at those individual inspection procedures to make sure all the attributes, all the samples that 8 are required by the individual procedures will have then been satisfied before we can say the program has been successfully implemented. That's our strategy as far as reconstitution.

12 Taking look the historical а at inspections that were performed and trying to put 13 14 those into perspective as far as whether we can take 15 credit for those.

The additional phases of our process 16 would be Phase 2, and I'll talk about that a little 17 bit with the additional considerations, the items 18 19 that make Unit 2 Watts Bar unique. And the next page talks about those other elements that we need to 20 21 factor into our inspection program.

22 Historical allegations, I mentioned as 23 far as we reviewed those historical allegations. The 24 generic communications, that was a very important

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piece where we needed to look at it, understand what NRR did from reviewing generic communications, but our emphasis was on what items need to be inspected. Pat was looking at it from a perspective of TVA's approach on it, does it satisfy NRC expectations as far as more programmatic?

Our focus was on do we need to inspect to 8 ensure that the programs are adequately implemented. We identified a number of generic communications that we will be inspecting, too. The CAPs and SPs are also included in that.

We went back and 12 Historical open items. looked at historically where -- what's the status of 13 Notice of Violations, our unresolved items, 14 our 15 things like that that we identified earlier in our 16 inspection program and didn't close out. And do we Are 17 need to go back and look at those? they 18 hardware-related issues? Are they something that we 19 need to touch now before we can say the plant was properly built? 20

21 all those additional elements So are 22 going to be rolled into our inspection program scope 23 and what we need to do before we can say the plant 24 was properly built.

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The next slide talks about the assessment I mentioned earlier the need for coming up process. with a new assessment process. What we did there, we looked at the Reactor Oversight Program, the structure of that and adopted many of the key components of the ROP assessment process, recognizing there are some distinct differences. There is no performance indicators for construction site.

9 There is also not the structure in taking 10 inspection it through results and running а 11 significant determination process and coming up with 12 a particular risk perspective and then we don't have an action matrix. So we didn't have some of the key 13 components in the ROP, but we did take the structure 14 15 many aspects that were applicable to a and as 16 construction site and are applying that to our 17 assessment process.

We have implemented that assessment process for 2008. We did our end-of-cycle review looking at inspection results. And we're going to have a public meeting coming up in April.

22 CHAIR RAY: It's very soon, in other 23 words.

MR. HAAG: Yes.

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CHAIR RAY: In April, meaning tomorrow or? MR. HAAG: April 14<sup>th</sup>, April 14<sup>th</sup>, April 14<sup>th</sup>.

5 Inspection accomplishments. I think we 6 talked about many of those. Establish of the 7 resident office. At one point there, I think it has 8 been brought up that resident office is totally 9 separate from Unit 1. They report to a different 10 organization chain in Region II. There is a lot of 11 interaction between the two as part of the oversight of construction activities and making sure they don't 12 adversely impact the Unit 1 operations. 13

The readiness inspection, that was really 14 15 an outcome of when we went back and looked at lessons 16 learned from previous construction activities and 17 problem and recognition that quite often areas 18 construction would start really before an applicant 19 had adequate controls in place. So we decided early 20 on going to look at TVA's we were program 21 development, their implementing procedures, their infrastructure to see if it was ready to support 22 construction activities. 23

So back in March of 2008, we did a two

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week inspection with, approximately, 67 inspectors focused on quality assurance activities, engineering activities, training, again, to have a level of assurance that TVA had adequate controls in place before it really started construction.

And the outcome of that was, for the most 6 7 part, we felt like they did have adequate controls in 8 place for the given the amount of work, but it was 9 recognized that there was more program and process 10 development that needed to take place. For example, 11 a number of procedures they didn't have in place at 12 the time, but they weren't doing the corresponding 13 work, so clearly that was an acceptable condition at 14 the time.

Since then, we have gone back and looked at those inspection procedures that deal with quality assurance and engineering. We have looked at how TVA has progressed in, you know, those programs across these and have looked at those.

20Okay. The rest of the bullets pretty21much have already been discussed.

22 MEMBER STETKAR: Just because I'm not 23 familiar at all with the inspection process, earlier 24 we heard that, for example, work being done on shared

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1 systems between Unit 1 and Unit 2 is going to be 2 controlled administratively by Unit 1, because --3 MEMBER SIEBER: Right. 4 MEMBER STETKAR: -- it affects --5 MEMBER SIEBER: The operating plant. MEMBER STETKAR: It's the operating 6 7 plant. Who, in the region, looks at the 8 effectiveness of those work controls? Is it you on 9 the construction side or is it Unit 1 under the 10 operation side? And what level of assurance do you 11 have that guys looking at normal operations are sensitive to the construction side and vice versa? 12 13 MR. HAAG: Yeah. 14 MEMBER STETKAR: Just in that work, you 15 know, control process, that integration of the things, if, indeed, you're organized. You know, you 16 said you have two separate offices. 17 18 MR. HAAG: Separate offices, yes. MEMBER STETKAR: You talk to one another, 19 but you actually are distinct. 20 21 I would respond to that by MR. HAAG: 22 saving just that the daily interaction that the 23 resident inspectors have, for example, a couple of 24 them carpool together, so that --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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MEMBER STETKAR: Yeah, but it's ad hoc, not a --

MR. HAAG: Yeah. I mean, we purposefully wanted to maintain separate organizations so, you know, we wouldn't have operational folks looking at construction activities unnecessarily. But there is certainly a level of interaction whether it is from the resident inspectors or whether it is from the region, my branch talking with DRP counterpart as far as what inspections we want to do.

We have given insights to certain ROP inspections. For an example, under the ROP, they do a programmatic inspection 50.59 process. We gave that inspection team some insights as far as things they wanted to look at or they might consider because of the Unit 2 Construction Program and the scope of what those 50.59s needed to be in the future.

So granted, it probably is informal, but certainly my belief is that we are having those interactions. And we are sensitive to that.

21 MEMBER MAYNARD: I would certainly think 22 that the Unit 1 operating inspection team would have 23 the primary focus for the work control system that 24 affects the safety for Unit 1 and all that. You guys

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1 may take a look at it and make sure that it is effectively getting the construction work done that 2 you need. But I would think it would be the Unit 1 3 4 construction or the Unit 1 operating inspection team 5 that would be the ones looking at the adequacy of the work controls to take care of the safety aspects. 6 7 MEMBER STETKAR: I was more concerned 8 about are there any gaps that aren't somehow covered? 9 Because the Unit 1 is working at -- looking at 10 strictly from the perspective of work control -- work 11 process control and the --12 MEMBER SIEBER: Isolation. 13 MEMBER STETKAR: -- construction is looking at, you know, different issues. 14 15 MR. HAAG: Right. 16 MEMBER SIEBER: Sure. MEMBER MAYNARD: The Unit 1 folks would 17 18 have to be making sure that those gaps didn't -- what 19 gaps --20 MEMBER STETKAR: Hopefully. 21 MEMBER MAYNARD: -- would be there that could affect safety. 22 23 MR. HAAG: Yeah. MEMBER MAYNARD: That's the observation. 24

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1	MEMBER STETKAR: Well, the operating
2	license, I believe there
3	MEMBER SIEBER: How the inspection
4	procedures are written is do you have inspectors
5	that say here is what I'm supposed to inspect. You
6	have one on the Unit 1 side and he is supposed to
7	inspect the boundary to make sure that the
8	construction effort isn't going to
9	MEMBER STETKAR: Effect them.
10	MEMBER SIEBER: jeopardize the plant.
11	Then there has to be a counterpart that says the
12	work that is being done in here matches the design
13	drawings when the craftsmanship is appropriate and
14	the records are being kept. So there is really a
15	joint thing that goes on in shared systems.
16	CHAIR RAY: Gentlemen, I have failed to
17	keep us on schedule here.
18	MEMBER ABDEL-KHALIK: Well, let me just
19	say
20	CHAIR RAY: Bob is 15 minutes over right
21	now.
22	MEMBER ABDEL-KHALIK: Okay.
23	CHAIR RAY: Yeah.
24	MEMBER ABDEL-KHALIK: One sort of related
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question. Has the operating experience of Unit 1 and/or that of similar 4-loop Westinghouse plants affected either the design process or the review process or the inspection process?

5 MR. HAAG: Yes. Part of our developing 6 what we wanted to inspect, we considered operating 7 experience. And we have defined those parts of 8 operating experience and how going we're to 9 accomplish that. So Region II has an effort to look 10 at operating experience. We have had it limited, 11 though, to what's reasonable and what we can 12 accomplish.

We have also looked though at what TVA is doing as far as operating experience, Part 21, things like that, so we are looking at it both from, you know, what we want to do and what we would expect TVA to do.

18 MEMBER ABDEL-KHALIK: Well, let me ask 19 the applicant then the same question. Has the 20 operating experience of Unit 1 or similarly designed 21 4-loop Westinghouse plants affected your design 22 process for Unit 2?

23 MR. BAJESTANI: This is Masoud Bajestani.
24 As I mentioned when I was going through my

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presentation, we have picked up all those lessons learned as we went through start-up. There was a whole bunch of lessons learned that we actually had to make significant changes. And I'm going to give you an example.

As we were going through the start-up, we 6 7 found out that we don't have adequate feedwater 8 heater bypass. So what we are doing for Unit 2, 9 actually since Unit 1 has already done that, they changed their's, so we are actually implementing the 10 11 same change. We are putting three separate lines on 12 feedwater heater bypass. So there are some changes.

13 MEMBER ABDEL-KHALIK: But there must be a 14 whole lot more --

MR. BAJESTANI: Oh, a whole --

16 MEMBER ABDEL-KHALIK: -- other than just 17 what you learned during start-up of Unit 1.

18 MR. BAJESTANI: There are a whole bunch of lessons learned. And all of those lessons learned 19 is not just from the first-cycle of operation. 20 It's 21 actually for the 12 years of whatever the normal -- I 22 mean, how many years Watts Bar has been operating. 23 All those lessons learned actually has been picked up 24 engineering program that part of we have to

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incorporate that into Unit 2 process.

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MR. FREEMAN: Yeah, this is Ed Freeman. Every one of those operational issues, and I'll call it industry operating experience, that has merited a change to Unit 1, a design change, we are reviewing and incorporating those design changes in Unit 2. So I mean, those improvements will be incorporated in Unit 2 as well.

MEMBER ABDEL-KHALIK: Thank you.

10 And likewise, I would like MR. MILANO: 11 to mention from the NRR side of it, as part of our 12 reviews, we do look at service advisories and we look 13 at operating experiences and changes in codes and standards and the rationale for why they are being 14 15 So that operating experience is factored changed. into and will be factored into our design process, 16 17 our design review process.

18 MEMBER SIEBER: Well, actually, your role 19 is if you look at the ASME Code and the -- you are 20 the enforcement agency for proper implementation of 21 the code, so there are certain factors that you have 22 to look at.

MR. MILANO: That's correct.

MEMBER SIEBER: I'm sure you're well

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1 aware of that. You have been doing it for 50 years. 2 But that is no small task. 3 CHAIR RAY: Bob? 4 MR. HAAG: Yeah. 5 CHAIR RAY: Or John, please. MR. HAAG: Okay. I think the only last 6 7 point I wanted to make was on the next slide that 8 talks about upcoming activities. We have talked 9 about, you know, what our inspections need to do, 10 what we need to look at. I wanted to highlight 11 though the problem identification resolution and let 12 you know that one of the areas that, you know, we thought, you know, doing more than just what the 13 14 program requires. 15 If you look at historical construction program, 25.13, 14, 12, there is very little emphasis 16 17 on the corrective action program and our verification 18 that the corrective action program is properly 19 implemented and is effective. 20 So we have taken that on during this 21 project to make sure that we follow some of the

21 project to make sure that we follow some of the 22 expectations that we do for the operating reactors 23 and for problem identification that we have 24 identified for new reactors and that we will have a

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much stronger effort to look at routine, corrective action activities, whether they are initiating curves at the right time, timeliness of the corrective action.

5 We are also doing periodic assessments. We have got an upcoming PI&R inspection in June where 6 7 we will have a team of inspectors out there that will 8 be looking at corrective action program. A similar 9 matter that the operating plants are looking at it 10 under the ROP. So lessons learned from, you know, 11 corrective action programs and the NRC not providing 12 enough emphasis in that area.

13 CHAIR RAY: Okay. Any questions of Bob?14 You'll stay there while Pat talks?

MR. HAAG: Yes.

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MR. MILANO: Okay.

MEMBER SIEBER: Before we conclude, maybeI could ask a couple simple questions?

19 CHAIR RAY: Yes, do they go to Bob or to
20 Pat, do you think?
21 MEMBER SIEBER: Well, they -- one of them
22 goes to the applicant.

CHAIR RAY: Okay. We are a long way fromconcluding, but go ahead.

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291 1 MEMBER SIEBER: Okay. The -- my question 2 is there is no construction work now being performed. 3 Is that correct? 4 MR. BAJESTANI: We have done --5 MEMBER SIEBER: At Unit 2. MR. BAJESTANI: No, we have done some 6 7 construction work. 8 MEMBER SIEBER: Okay. And do you have 9 the inspection procedures to inspect the work that is 10 being done now? 11 MR. HAAG: Oh, yes. We have been using 12 inspection procedures. I would point out, Jack, the 13 CHAIR RAY: milestone schedule at TVA showed us it has something 14 15 called "Commenced Principal Construction Activities Back in June of 2008." So I assumed that they were, 16 17 in fact --18 MEMBER SIEBER: So you're doing 19 something. Okay. So the procedures are available, 20 the inspection reports that have already been 21 completed are available to us to look at? 22 MR. HAAG: We actually performed four 23 quarterly inspections in 2008. 24 MEMBER SIEBER: Okay. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	MR. HAAG: And the results are available.
2	MEMBER SIEBER: Okay.
3	CHAIR RAY: Pat?
4	MR. MILANO: Okay. I'll get us back on
5	schedule. Okay.
6	CHAIR RAY: The schedule isn't perfect,
7	I'll say that.
8	MR. MILANO: All right.
9	CHAIR RAY: So don't worry about it.
10	MR. MILANO: As I mentioned earlier, the
11	staff has incorporated TVA's schedule of licensing
12	activities into the staff's overall project schedule
13	using Enterprise Project Management Tool. And in
14	addition to scheduling the activities and assigning
15	resources for the major review efforts, the staff is
16	currently working to input the other actions
17	identified in LIC-110, as I mentioned before, the
18	interaction such as these, the potential hearings and
19	other items.
20	CHAIR RAY: Well, I would comment on two
21	things that seem, to me, to be untimely, but maybe
22	they aren't untimely, since you got this
23	sophisticated scheduling tool. Are they timely, the
24	appointment of this review group and the
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1 determination that it is required to make with regard to design verification? 2 3 First of all, the Design MR. MILANO: 4 Verification Program, that's a licensee program, but 5 the TVA has made its decision with regard to whether 6 or not they are going to -- whether they are going to 7 do an IDVP. 8 Oh, now wait a minute. CHAIR RAY: Ι 9 tell you again that this LIC-110 has this WRAG 10 recommend to whether or not it should be done. 11 That's what I'm asking about. I'm not asking what 12 the applicant is doing. 13 MR. MILANO: No, I'm not trying to say that we -- I'm not trying to justify why that -- the 14 15 reactivation assessment group is -- why it is late. 16 CHAIR RAY: Okay. All right. 17 MR. MILANO: I agree with you. 18 CHAIR RAY: My point is that you are 19 talking about your integrated schedule and so --20 MR. MILANO: Yes. CHAIR RAY: And so it invited a comment. 21 22 MR. MILANO: I agree with you. We are 23 putting those items into it recognizing that there 24 are some things that are probably not timely and **NEAL R. GROSS** 

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stuff. However, to digress a second, since 1 you brought up that point, there are aspects that have 2 been -- that will be codified in the charter. 3 We 4 have on at least three occasions had lengthy 5 discussions with -- between NRR and Region II about 6 things that we need to coordinate between ourselves 7 and then subsequently, you know, how we are going to 8 elicit that information from TVA and things like 9 that. So we have met on a number of occasions 10 11 on an -- with an ad hoc group that will probably be 12 incorporated into the assessment group. Not to say it is -- you know, we don't need the charter and we 13 14 don't need to have that group functioning. But I'll 15 stop there. 16 MR. RAGHAVAN: Excuse me, this is Just as a matter of lessons, 17 Raqhavan. in Browns 18 Ferry we had the regulatory assessment, which was 19 called the Oversight Plan. It was operating in an informal basis, but just prior to -- about two years 20 21 prior to the actual restart of the facility, that's 22 when the panel started meeting in a more periodical 23 basis. Like maybe three months and three months and

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once a month, it just went on.

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So to address your question, Mr. Ray, in terms of timeliness, we felt that that two years would be a sufficient time to get back on track. Right now, we are -- the LIC-110 just is to put a framework together. This is just an office instruction of how do I go from A to Z? How do I start this project? And how do I end this particular project?

9 And what we intend to do is just as we go 10 along right now when the engineering is done and the 11 construction is going on and the inspection starts, 12 then that's when the regulatory assessment will kick And we have done several at this point. 13 in. As Frank pointed out, we have done several meetings, but 14 15 it has not been that periodic. It has been more like every four months. In fact, we are scheduled a 16 meeting on May 13<sup>th</sup>. 17

18 So it's an ongoing process. We have not 19 started it. I understand your concern with regard to the timeliness. I think two years will be 20 an 21 kick off appropriate time to the regulatory 22 assessment group.

23 MR. MILANO: Okay, okay. You know,
 24 besides aiding the staff in an effective efficient

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accomplishment of all necessary actions, the final schedule, as I indicated, will provide a useful history or reference of what it took to complete the project.

5 This slide here just highlights some of 6 the major milestones. And since we do input on a 7 periodic basis from TVA's schedule, they provide us a 8 bi-weekly update of their schedule, and we -- and it 9 is automatically inputted in our ours and the EPM, 10 you will see that these dates pretty much coincide 11 with what TVA has stated.

That's basically barring -- now, if you don't have any other questions, we will just move on to the conclusion.

CHAIR RAY: Go ahead.

16 MR. MILANO: Okay, yep. In conclusion, you know, the staff would request of the ACRS that, 17 18 you know, you provide us some type of letter, report 19 if we should go to a Full Committee in May, with any recommendations that you may have with regard to the 20 21 current review starting point, as we have described 22 today in Supplement 21, and with regard to the 23 inspection manual, Chapter 25.17 and others.

So that forms the basis of where we are

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starting for both the licensing and construction inspection.

Also, we look at this overall process of interfacing with your Subcommittee to be just one of a number of interactions. Rather than coming in late in the program, we would like to, you know, continue to have this type of dialogue while -- with your Subcommittee on a somewhat periodic basis.

9 Looking -- when we look at our schedules 10 and stuff, we felt that based on the technical 11 information that would be coming in, that it would 12 effective have the probably be most to next 13 interaction in about a year from now, March 2010, and 14 then a year after that. And then as we start to 15 approach the time period where TVA would be coming in and requesting the staff to issue an operating 16 license, then the meetings would become closer and 17 18 ultimately would -- we would have our -- the meeting 19 that would lead to an ACRS coming to some type of recommendation as to whether or not the information 20 21 on the design and inspection of the facility supports 22 the reasonable assurance determination.

23The staff, you know, plans to, by our24scheduled plans, present its information to the Full

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298 1 ACRS Committee in about November 2010 for a final letter on the Watts Bar 2 operating license. Excuse 2 me, I'm sorry, 2011. Thank you. 3 4 And this will support a staff briefing 5 for the Commission in about January 2012 with the plans for -- if every -- if we do come to it -- come 6 7 to that determination with regard to reasonable 8 assurance, that we would recommend an issuance of the 9 full power operating license in September 2012. If you don't have any questions with 10 11 regard to, you know, this recommendation with regard to our future interfaces with the Subcommittee and 12 possibly with the Full Committee, I would like to 13 just bring up a couple other points. 14 15 CHAIR RAY: Go ahead. 16 MR. MILANO: And -- excuse me? CHAIR RAY: Go ahead. 17 18 MR. MILANO: Okay, um-hum. With that, you know, we have covered a lot of different topics 19 today, both from the standpoint of the staff and TVA. 20 And what -- before we adjourn, I would like to know 21 22 if we should -- if you should decide that we, you 23 know, go to a Full Committee meeting in May, if you 24 could give us some guidance as to what you would

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expect us to cover, since we spent the whole day today and yet, you know, that's a -- it's a limited appearance before the Full Committee.

4 You know, is there anything in particular 5 from today's conversations that you would like us to address? And likewise, if there is something that we 6 7 -- that you feel that we have missed, is there, you 8 know, something else that you would like us to add 9 into it, whether it is at the Full Committee meeting 10 or would you like -- or is there something that you 11 would like us to address at the next Subcommittee 12 meeting?

13 CHAIR RAY: Okay. Well, we will -- we're 14 going to deliberate, as I said, at the outset and 15 then at the midday break as well and try and arrive 16 at some view among the Members of the Subcommittee 17 and we will do that after we determine -- after we 18 are done with your discussion and we determine if 19 there is any public input to be heard here today.

And you, obviously, can observe our discussions. They may lead to further discussions with the Full Committee later this week and then feedback to you.

MEMBER STETKAR: Can I just ask him one

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CHAIR RAY: Of course.

3 MEMBER STETKAR: Thank you. It's only 2 4 minutes.

CHAIR RAY: We're not done.

6 MEMBER STETKAR: Just to help get this a 7 bit straight. And this is relevant to interactions 8 among us, between us. You mentioned, Bob, that you 9 have done some amount of inspections in 2008. And I 10 might have missed it, because I was looking at other 11 things, what level of inspection activity do you 12 anticipate in calendar year 2009?

In other words, you know, there is something that says well, you would expect to come back to us a year from now and have a meeting. What-- do you expect most of your regional inspection activity to be done in the 2010/2011 time frame or do you have a pretty aggressive schedule to 2009?

MR. HAAG: 2009 --

20 MEMBER STETKAR: I mean, you know, you 21 kind of gave us bullets of the things you are 22 planning to do, but you didn't really speak to how 23 that was organized very well.

MR. HAAG: I mean, having doing the

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1 inspection has to coincide with site activities, especially those work observations. And then the 2 records review will follow. We are doing some of the 3 4 preliminary inspections now as far as looking at 5 procedural adequacy to -- you know, for those 6 procedures that are available. 7 But you know, a large amount of safety-8 related work per schedule will be starting mid-2009, 9 late-2009. So we -- our corresponding inspections 10 will look at those and ramp up. 11 MEMBER STETKAR: Thanks. 12 MR. HAAG: Yes. Any other questions to the 13 CHAIR RAY: 14 staff from Members? All right. Maitri, do we have 15 any public? 16 MS. BANERJEE: No. I didn't see any 17 public, other than, of course, TVA, and everybody else from the licensee --18 19 CHAIR RAY: Well, the applicant --20 MS. BANERJEE: -- and qualified --21 MEMBER MAYNARD: On the phone still? 22 CHAIR RAY: Huh? 23 MEMBER MAYNARD: Do we have any public on the phone? 24 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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302 CHAIR RAY: Anyone on the phone wish to 1 make a comment? We will open the listen only for a 2 3 minute here and see. Any comment from telephone? Ιf 4 not, we will --5 MR. MORRIS: No comment. 6 CHAIR RAY: -- go back to listen only and 7 conclude that there are no members of the public 8 wishing to make input then. 9 MS. BANERJEE: Can I ask a question, 10 please? 11 CHAIR RAY: Of course. 12 Okay. What I have been MS. BANERJEE: thinking is --13 CHAIR RAY: Just one? 14 15 MS. BANERJEE: Yes, just one. I think I asked it 16 sort of before, but I'm not totally 17 convinced I got an answer. The inspection program 18 elements I see here and I do not see anything coming 19 in from the Commission policy statement on deferred What I'm thinking, like TVA said, they 20 plants. 21 opened up systems to see the internal condition 22 system that has been in lay-up for at least 25 years 23 and they checked the samples and stuff like that. 24 Do we have any inspection elements on **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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those work? I mean, that particular kind of work that has been done?

MR. HAAG: As far as the Commission Policy Statement, it talks about once the applicant notifies the NRC of its plans to reinstate construction, reactivate construction activities, there are certain things we need to do. We did those during the readiness inspection back in March 2008.

9 Clearly, we are going to be looking at 10 the refurbishment program. Like said, Ι we 11 questioned TVA as far as what they are doing on 12 passive systems. We are going to be looking at the active systems, components, amount of replacement, 13 14 what they are doing. We have looked at their 15 overarching program. They are still developing the 16 details.

We were up there several weeks ago and asked for -- you know, give us some specifics as far as what is being changed out. And they are still working on those plans. They have got, again, that overarching, you know, program guidance, but the individual at the component level, that's still in progress, right, Masoud?

So I would say, you know, we will be

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looking at that, but it's really too soon.

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MS. BANERJEE: Yes, but the deferred -the policy statement talks about say the lay-up program.

MR. HAAG: And again, we looked at those during the resident inspections.

7 MS. BANERJEE: So like they have done the 8 sampling and said, you know, the sample -- from the 9 sample we don't see any corrosion going on and it's 10 fine inside, you know, it looks like just hydrolase. 11 But after you hydrolase, you cannot take another 12 sample, because -- for some time, because you lost, you know, the first opportunity to see what happened 13 in four or five years, you know, revealing inside 14 15 that system.

So did you have any inspection element to look at that particular, you know, activities to help us agree with what TVA's conclusion was in terms of lay-up? And I think Otto mentioned that lay-ups could sometimes, if not done right, could even do harm.

22 MR. HAAG: My view on that would be that 23 the Commission Policy Statement is on deferred 24 plants. We have satisfied those elements as far as

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what it directs us to do once construction activities are reinstated. So we are beyond Commission Policy Statement for Watts Bar Unit 2. We are into looking at construction activities. Refurbishment is a key part of the construction activity for Unit 2, because of its history. And we will be looking at that as part of our inspection.

MS. BANERJEE: Okay.

9 MR. HAAG: Now, I mean, do I have an inspection procedure 10 inspection program or that 11 specifically talks about that? No. Because in my 12 view, it's one of those unique circumstances. You know, it really wasn't envisioned as far as 13 this situation. 14

15 MR. RAGHAVAN: This is Raghavan. The Commission Policy Statement has seven issues that the 16 applicant has to do and three issues that the NRC has 17 18 to do. And that's exactly what they did in terms of 19 the Construction Readiness Assessment Program. Once that thing is done, we're no longer in the Deferred 20 21 Policy Statement. We are in the active mode of 22 construction.

And during that time, all the inspection procedures in the manual Chapter 25.12, 13 and 14, as

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306 1 supplemented by the delta, what I call the delta program, which is the 25.17, would constitute the 2 3 inspection program. 4 MS. BANERJEE: So basically, you are 5 saying things like that were done? 6 MR. RAGHAVAN: Yes. 7 MS. BANERJEE: Okay. 8 Well, the policy statement MEMBER BROWN: 9 talks about maintenance preservation documentation of equipment. That's an item under --10 MR. RAGHAVAN: Yeah, that's what I am --11 12 MEMBER BROWN: -- Section III. And it 13 lists the applicant or whoever it is is supposed to establish, maintain and verify the quality of plant 14 15 conditions, etcetera, on and on and on when you read 16 that. And what you are telling me, that's all done. 17 That is all past, happened. And I don't think 18 that's really the question that, at least not in my own mind, we haven't addressed. 19 In other words, what are -- we've got a 20 21 30 year window, since this stuff was -- nobody has 22 doing anything, 25 or whatever it is, 1985, pick the 23 year, and nothing has been done with any of that. 24 what elements of the system And structure and **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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components, what stuff in there is affected by just age, period, 25 years?

I mean, organic material-type components like cables, insulation systems, electrical or insulation thermal material, whatever other type, stuff that changes and degrades just because it's 6 there. It's not like blacksmith technology stuff 8 know, stainless steel, like pipes, which, you stainless steel. I mean, this is a simpleminded this, making electrical guy asking these broad general statements.

12 And they change whether you are actively using them or not. And there is nothing -- nothing 13 was said in either the 120 day letter or in the 14 15 Supplement 21 relative to that thought process on stuff that has just been sitting around for 25 years 16 and how you address the different -- or how each of 17 them in its status now, it's kind of the initial 18 condition question that Said brought up earlier, I 19 mean, Harold also in the context of the discussion, 20 21 what is different about all the stuff that was 22 applied to Watts Bar 1 as opposed to what is 23 different relative to how you are starting the 24 starting point? Your initial starting point for

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And that really hasn't come out in any --I don't want to say coherent, it just hasn't come out. I mean, the framework is framework. You pick one. You've said hey, we've gone back and looked at where they were, all the corrective action programs. You looked at blah, blah, blah, I had a list here somewhere, generic letters, all that type of stuff. You established that's where we're going to start.

And the thing that was missing in my own mind was this assessment of parts, whatever the parts are, that are affected by time, that don't really get covered by any of those issues. There may be none. It's just, in my simple mind, it didn't seem to come out.

MR. HAAG: Our outlook on that was, as I mentioned earlier, clearly it's an important part of what we need to look at. But we need to recognize it's TVA's responsibility to define it, because they didn't implement an effective lay-up preventive maintenance program. They have got to go back and re-establish that. They need to --

23 MEMBER BROWN: Well, somebody has got to 24 ask them.

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309 1 MR. HAAG: They --2 MEMBER BROWN: Someone has got to tell 3 them to do that or ask them to do that. 4 MR. HAAG: Well, we believe there -- they 5 have got the initiative to do that. What we need to 6 do is clearly inspect it and judge its adequacy. And 7 that's on our plate. Certainly, a take-away from 8 this meeting is we need to define that and I need to 9 be able to provide you whether it is just our own 10 internal guidance through our inspection staff and to 11 ourselves as far as that we are adequately doing that, be able to present something to you. 12 Because right now, it's not covered by an 13 14 inspection procedure, because again, I don't believe 15 we anticipated that type of situation. 16 Well, no, MEMBER BROWN: it's very 17 unique. 18 MR. HAAG: Yes. 19 MEMBER BROWN: That's why we are having a meeting. 20 21 MR. HAAG: So --22 MEMBER BROWN: And I'm not worried about, 23 you know, motors being rewound or generators being 24 You know, Harold and Jack were rewound. very **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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eloquent. Those types of things will be fixed. You know, they are on the checklist and they will be taken. What we are really looking for if -- in my own mind, is what are the things that we haven't thought of that we ought to be looking at?

MR. HAAG: And I think we owe that to you as far as our thought process and our strategy going forward on how we want to assess that.

MR. RAGHAVAN: This is Raghavan.

10 Well, let me make one MEMBER BROWN: 11 other observation. I mean, I'm not a mechanical 12 engineer, but a bunch of the construction project, a bunch of bolts and stuff were put together. 13 Thev were torqued up. They are in place. Nobody has done 14 15 anything with them for 25 years. Do they relax? Do 16 they have to be redone? Is that part of the program to go back and look at that part of the aspect? 17

18 And maybe I don't know what I'm talking 19 about, but at least we ought to know that those mechanical fit-up type stuff that affect the overall 20 21 operation of the plant, that are kind of like 22 blacksmith technology, do they change because they 23 were sitting there or people say yeah, they could, therefore, we're going to check them all? 24 And there

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1 is the list. That's -- I'll stop right there. 2 MR. RAGHAVAN: Okay. 3 MR. HAAG: Harold? 4 MR. RAGHAVAN: What I want to say is that 5 if my memory serves right, in the year 2007, we asked a question in a documentation request for additional 6 7 information. We requested TVA to address 8 specifically this issue, what I call as, the aging 9 phenomena. And that's something that program is 10 there in our regulatory framework for us to address. 11 And unfortunately, the timing is not right. We did 12 not address it in the SSER 21, but that's one issue. 13 And the TVA is supposed to make а submittal as to how they address those issues. 14 And 15 that would be evaluated programmatically and any inspection that arise out of that will be done by the 16 region. 17 18 CHAIR RAY: Okay. Does the applicant 19 want to make any comment on this last point as to some pending --20 21 I still say that for MR. BAJESTANI: 22 future meeting, we can go through the detailed review 23 of what we are doing to make sure we address the 24 question that we talked about, what other components, **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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essentially, any polymer, any components, any material that is susceptible to aging as we go through the refurbishment is going to be changed out or establish limited qualified life.

CHAIR RAY: Okay. Thank you. All right. Anything else again, one last time, for the staff at this point before we engage the Members of the Committee and Subcommittee in the discussion?

9 Okay. I'll make a comment and then I'll 10 go around and ask for input from each Member. My 11 comment is simply to go back and observe that the 12 request, the main thing we need to think about here -13 - and maybe I should say one other thing first.

We appreciate, we all do, that this is a unique circumstance. Charlie called it ever very unique, so that's better than unique, I guess. And that therefore, the information being presented to the Committee and this interaction that was described is, I think I can speak for myself only here, but I believe it's welcome and helpful.

The issue is not that that -- the issue for us to consider is whether there is something that would warrant and would be appropriate for the ACRS to write a letter on, at this point in time. That's

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the issue at hand, not is this a good thing for us to have done. And in that regard, the request that has been made to us by the staff is for a letter in May with ACRS' recommendations for the current review starting point.

The current review starting point being defined initially as what is set forth in Supplement 21. Just now, it was extended to include the construction inspection program in IMC 25.17. IMC or ICM, which is it? I forget.

MR. HAAG: IMC.

MEMBER SIEBER: That's a --

CHAIR RAY: Huh?

MR. HAAG: IMC.

IMC. 15 CHAIR RAY: So that constitutes 16 the, at least, requested scope of a letter for us to consider. Of course, the Subcommittee may recommend 17 to the Full Committee a letter that includes other 18 19 things. And we have certainly discussed other things So that's the scope of the discussion I 20 here today. 21 would like us to engage in and also that we can take 22 something to the Full Committee and also advise 23 participants in our meeting here today as to what our 24 recommendation is going to be.

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1	The Full Committee will make its own
2	decision. Huh? So I'll start with Jack.
3	MEMBER SIEBER: Okay. I
4	MEMBER ABDEL-KHALIK: Do you want to go
5	off the record?
6	CHAIR RAY: No. I talked to Maitri and
7	we thought that we should do this on the record, so
8	we will.
9	MEMBER SIEBER: Okay.
10	CHAIR RAY: Jack, go ahead.
11	MEMBER SIEBER: I think from an overall
12	standpoint in my preparation for this meeting, I
13	tried to picture what I would do if I were the
14	applicant and what I would do if I were the staff as
15	far as putting together a construction program, a
16	pre-construction program where you evaluate what
17	exists at the plant right now.
18	And I have looked at it from the
19	standpoint of separate tasks, you know, three tasks.
20	One of them is the pick-up and finishing of the
21	development of the FSAR, and the SER that goes along
22	with it, Supplement 21, to me, didn't help me,
23	because I would have to read the FSAR and the SER,
24	where it is right now, to make a judgment as to

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whether the items are opened or closed.

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And I don't have the documents and I didn't do the work. That's a fair amount of work. And the only way that we could do it is on a sampling basis. And so in the same way with the construction program and its corresponding inspection program, we don't have the base documents, so it's hard to make decisions on the details.

9 If we write a letter and say things, I 10 think we have to do it at a very high level. And in 11 that regard, I think it is my opinion that both the applicant and the staff are doing the right kinds of 12 things to move into refurbishment and completion of 13 14 construction and also the completion of the 15 application, which includes the FSAR its and 16 corresponding safety evaluation report.

Right now, without further study, I don't 17 18 think that we can say too much more than that, that 19 the overall plan is -- appears to be okay. But the details of how this all goes together, I think, for 20 21 us to be able to say anything about that, we have to 22 do more work. And so I come down with that kind of 23 an opinion that has to be kept at a high level, based 24 on what we know right now.

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Overall, I do think the plans are pretty good. I think your construction schedule is pretty aggressive considering that the plant was laid up and parts were borrowed and so forth. And I think your -- since the unit appears to be pretty well integrated into Unit 1, that the construction effort is not going to be an easy one, because you are basically doing construction in the same building, so that the operating plant exists.

10 And so there is some challenges there. You brought up the staff requirements memorandum 11 12 where the Commission expressed a desire to move into additional, you know, improvements. 13 I commented in writing to the numbers here about that related to the 14 15 fact that the licensing basis is already established and most of the design in the construction so far 16 meets the licensing basis that was established for 17 18 the plant.

On the other hand, there is tons of generic letters and TMI action plan requirements, 737 and so forth that, obviously, have to be integrated into the design. And plus, a whole host of other issues, for example, gas accumulation in lines that prevent operation of pumps. Now is a good time,

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rather than pre-operationally, to take those kinds of things into consideration.

So I think that it is more up to our Subcommittee Chairman and the Full Committee to decide whether we ought to write a letter or not. Ι think that it is important for us to know whether the staff really needs a letter, at this time, or if we 8 need to do additional work to get enough detail to write a more comprehensive letter than to just say the overall plan looks okay.

11 CHAIR RAY: Fair enough. Thank you, 12 Jack. John?

13 MEMBER STETKAR: Yes. Several things 14 Jack said I would echo. I guess my personal concern 15 about writing a letter is how -- what does the letter 16 say and how would it be interpreted? If we write a letter that says that this is an appropriate starting 17 18 point, is the interpretation of that letter tacit 19 acceptance by the ACRS of these words that say resolved and open in this? 20

21 Without -- you know, as Jack mentioned, 22 haven't had the opportunity to have the we 23 information presented to us to make a judgment about 24 So I would be really concerned that we have to that.

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be very, very careful about how such a letter was written to have enough caveats in it to make sure it wasn't misinterpreted as --

MEMBER SIEBER: Acceptance.

MEMBER STETKAR: -- acceptance of this particular list of words that say open and resolved, relative to requirements. So that being said, I'm not quite sure how that letter would be written, if there was a letter.

10 The other -- on the flipside about why a 11 letter might be issued/written and something the 12 staff might not like, if they ask us for a letter, is some of the things you brought up in terms 13 of 14 timeliness of this process. I think there may be 15 some concerns about the timeliness of the inspection 16 process and the reviews that are being done that are 17 programmatic, in a sense, but are somewhat of a 18 concern.

19 And the question is, you know, should --20 qiven the request to write а letter, is it 21 appropriate for us to comment? Do we know enough 22 about that to comment and, essentially, raise a bit 23 of a concern in that area? Again, it's not an issue 24 that we have been requested to comment on, but the

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door has been opened. I'll leave it at that.

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CHAIR RAY: Thank you, John. All right. Mario, did you want to say anything, at this time?

MEMBER BONACA: Yes. I think that, you know, I echo what was said before regarding a high level letter. That's the only kind of letter we can write. It would be so high level that maybe it would be meaningless, because, again, we have talked about licensing basis being Unit 1. We talked about Supplement 21.

And again in Supplement 21, it is full of statements about open items or resolved items. We haven't really seen the details of it. And so do we believe that we have -- there is a plan out there and things are happening? Yes. So we can say that.

16 But beyond that, I think we can build 17 anything constructive. It seems to me that, you 18 know, one concern I have is that if we are requested the letter in March of 2009, and then there is a plan 19 to update us on March 2010 when some significant 20 21 progress may have been made, and then again March 22 2011, and we will be probably as -- unequipped to 23 comment, at this time, with such long period of time 24 in which we were not looking at the project.

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The better approach seems to me would be to have another Subcommittee in a couple of months whenever you can think that you can be prepared to give us a better overview of what is in Supplement 21 and then have something more meaningful to say by that point.

So to have a more concentrated series of presentations to us where we can be familiar with the project better than we can be this way. Just a suggestion anyway.

11 If I had to make a call, and I'm speaking 12 just as a Member here, I would probably not write a 13 letter. But that's -- I'm open to hear from the Full 14 Committee about that.

## CHAIR RAY: Said?

16 MEMBER ABDEL-KHALIK: I quess I agree lot of the comments that have been made 17 with a 18 before. What I really would have liked to have seen 19 is, you know, a clear explanation of the current state of Unit 2. And that didn't come across today 20 21 I think, you know, the Full Committee would at all. 22 probably be far more interested in knowing what does 23 this plant look like today.

MEMBER BONACA: And that's a point I

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would like to point out to Said.

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MEMBER ABDEL-KHALIK: And whether these, you know, corrective action programs and special programs are really appropriate and will do the job.

CHAIR RAY: Come with us in July to the south.

7 MEMBER ABDEL-KHALIK: You know, we get 8 more than just simply a site visit looking around to 9 That would be far more informative in my see it. 10 view than just making a determination as to whether 11 this Supplement 21 is the right way to go or we 12 concur with it, even though we don't really have all the information that would allow us to pass judgment 13 on the details of things as John mentioned. 14 That 15 would be my comment.

16 CHAIR RAY: Mario, did you want to say 17 something?

18 MEMBER BONACA: No, I just was saying 19 that I forgot to say they asked already that the Full Committee we get some -- even just some pictures of 20 21 the plant, what it looks like. You know, I am 22 leaving this meeting with total lack of а 23 understanding what 60 percent of construction 24 progress means. It would be nice to know that there

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1	is a reactor vessel somewhere. They can do that.
2	MEMBER ABDEL-KHALIK: Or what a plant
3	that has been dematerialized over the past 25 years
4	looks like.
5	CHAIR RAY: Well, yeah. The perhaps
6	those that information does appropriate lie in a
7	subsequent meeting that is not as far off as a year
8	from now. Let me finish getting the input here. Are
9	you done?
10	MEMBER BONACA: Yes, sir.
11	CHAIR RAY: Otto?
12	MEMBER MAYNARD: I don't think we should
13	write a letter and I'll get back to that in just a
14	minute.
15	CHAIR RAY: Be really clear.
16	MEMBER MAYNARD: I did really appreciate
17	the meeting. I found it very informative. I think
18	the staff and the applicant, I think, it really
19	helped me get a better understanding of kind of where
20	things are and I agree with Said, it didn't really
21	get into some of the detail of what the actual state
22	is, but it's a starting point for us anyway. And I
23	do think it is good to get engaged, at this point,
24	and be starting to take a look at that.
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You know, I don't know what good or what 1 2 we could say in a letter. I certainly don't think we could endorse Supplement 21. I don't think we could 3 4 endorse the interim manual Chapter 25.17. I kind of 5 relate this kind of back the way we do license renewals when we have Subcommittees and stuff, we 6 7 typically don't write a letter unless we have a 8 concern, an overriding concern with the process that 9 we don't think is going to get dealt with or we're 10 not going to have another opportunity that we write a 11 letter.

But I'm not sure that we need to write a letter, at this point. I'm not sure what it would really add to the process and stuff here. So that would be my recommendation. But I do think it's good to be engaged at this point and get the briefing that we did today.

CHAIR RAY: Okay. Charlie? MEMBER BROWN: I agree. Although I hate to say this, because I have to write a letter this week and you are going to get out of it, and that is just hammering me something awful here. But to make

24 standpoint. But I agree, I don't see that we have

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your life easier, I'm just teasing you from that

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got enough meat to do that right now and I'm not sure what would come out of it.

On the positive side, I think the staff 3 4 and TVA, I think, were -- whenever they decided to go 5 do this and bringing the plant out of a deferred status and non-lay-up status for such a long period 6 7 of time, had to establish a framework to get started. 8 We can argue whether the framework is a qood 9 framework, whether it's complete or whatever, I don't 10 think it's a bad framework. It touches a number of 11 elements or most of the elements of what you need to 12 think about, because it's not a brand new design. It's something that is there. 13

14 So you take something you've got and you 15 go -- and you take Supplement 21, you take what is 16 going on, you take the correct action programs, you 17 take generic letters, you look at the inspection reports, you see what the condition of the plant is, 18 19 which we don't have a handle on right now, you've got least not based on 20 all these -- well, at the 21 presentations, and that, to me, is where they started 22 and now we are in the process of doing that.

23 So I don't -- you know, I think it was --24 you've got to start somewhere and you've got to pick

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a way to go do it, whether we have to, you know, kind of put the stamp on it or not. I don't see why we need to do that.

4 I would like to see another Subcommittee 5 meeting, you know, I don't -- I think a year away is 6 too far, that really tries to address what is the 7 status of the plant. What are the aging mechanisms 8 we have to do with -- deal with? And what are the 9 results of some of these looking at these corrective 10 action programs and how they were applied to Watts 11 Bar Unit 2? Because we didn't -- while you say you 12 are going to do that, we don't have any -- there is nothing, no results, although you may have some, we 13 just didn't go through those. 14

15 And I don't -- I'll let Jack review all 16 the inspection reports. He is good at that. I did take a look, by the way, I tried to go back and pull 17 18 a couple of the last NUREGs, the previous out 19 supplements, and the only ones in the database were and they were patently uninformative 20 18 and 19 relative to most things, so -- once I got them opened 21 22 anyway.

So again, I'll finish up. I had my one 24 issue, no letter, I'm happy. Well, I don't know.

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I'm thinking.

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CHAIR RAY: Well, I guess on the one hand 2 I would share Jack's point that it seems, at least to 3 4 me personally, that the things being done are the 5 right things and the applicant seems to be doing a right and responsible thorough job. If I was going 6 7 to write a letter though, it would be one that 8 neither the staff nor the applicant, I think, would 9 like because it would, coming back to what John said, say it looks to me like the NRC is on the critical 10 11 path of this project or ought to be, because the 12 applicant is going forward and the NRC is still thinking about it. 13

that's unfair 14 Now, perhaps, probably 15 unfair. And that's where we need to get more But that would be the conclusion I 16 information. would draw, at this point, in time is can the NRC 17 18 stop this train before it goes further than it should 19 before they have done what they need to do?

And notwithstanding all the scheduling tools and so on that may be in play here, I'm just very skeptical that looking at the critical path, as I see it here from the applicant, that the NRC is going to keep up with the pace of this thing. And so

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1 that would be what I would most value in any further discussions that we have is some better assurance 2 3 that, as regulator, we are able to do the things that 4 need to be done to keep pace with what is going on at 5 the plant, given the unique circumstances that exist. Okay. With that, I'll invite any other 6 7 comments anyone wants to make before we adjourn. 8 MEMBER ABDEL-KHALIK: Just a comment. 9 MEMBER BONACA: I would like to know, you 10 think know, what they would about having the 11 Subcommittee meeting in a shorter period of time say 12 two months from now to give us some more detail on that Supplement 21. 13 14 CHAIR RAY: Okay. 15 MEMBER MAYNARD: What about the July 16 meeting? 17 Well, let's not limit it to CHAIR RAY: Can we include the construction 18 Supplement 21. 19 inspection? 20 MEMBER STETKAR: Yes. I mean, that's, to 21 me, more important. I guess I was a bit surprised to 22 hear that the level of effort in terms of inspections 23 in 2009 doesn't seem to be very intense or panic-24 driven, if you will. **NEAL R. GROSS** 

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328 Yes, for some reason that's 1 CHAIR RAY: 2 the impression that comes across. 3 MEMBER STETKAR: Yes, because there seems 4 to be a whole bunch of stuff that you could and 5 should do. For example, there is a lot of concrete out there. There is a lot of rebar out. And I've 6 got to change that. I mean, they are not change --7 8 you know, they are doing stuff on the water cooling 9 systems, they're doing stuff on the turbine They are doing stuff on -- you know, they 10 generator. 11 are doing active work changing things, but there is a lot of passive structural stuff out there that, first 12 13 of all, you could get it out of the way. Second of all, it could be s 14 show 15 stopper. CHAIR RAY: Yeah, well, again, we may be 16 unfair in --17 18 MEMBER STETKAR: Maybe we're not being 19 fair, but the --20 I believe that you've got CHAIR RAY: 21 some feedback here, the question was -- where is 22 Rags, there he is, as to your willingness to pick up this story fairly soon and continue it, given what 23 24 you have heard here today. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1	MR. RAGHAVAN: Thank you, sir.
2	CHAIR RAY: You are?
3	MR. RAGHAVAN: Yes. We're going to do a
4	couple of things. No. 1, is I think ACRS show the
5	Members plan to visit the site in July.
6	MEMBER SIEBER: Right.
7	MR. RAGHAVAN: So that will give you a
8	better understanding of the condition and the status
9	of the plant. No. 2, is a couple months from that
10	date, we would like to come back to the ACRS
11	Subcommittee again to make a presentation which will
12	take all the information that we gathered here and
13	bring it to you. That's also an appropriate time
14	because, at that particular time, we would have done
15	a lot more engineering work than what we have done.
16	Even though I would like to reiterate
17	that the SSER 21 took us a lot of time for us to do.
18	We did lots of lots and lots of work. We did
19	about a review of 20 supplements, 1,100 generic
20	documents, 29 corrective action programs, lots of
21	meetings with the applicant and we did a lot of work
22	on this one.
23	The purpose of this SSER 21 is to really
24	implement the SRM. If the SRM come and just say the
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licensee or the applicant had to do new requirements, we would not be here. We would have been doing something else. The main reason that all the SSER 21 is to exactly implement the SRM's requirement, which said that you need to establish -- we took the SRM to say the staff needs to establish what's the baseline. What has been previously reviewed and approved?

8 And we will -- that's what we were trying 9 to document. And we looked at the corrective action 10 We looked at the previous SSER. program. We looked 11 at the previous generic letters and so on. Do we 12 have other issues? Yes, we have other issues that we need to proceed. And the applicant has to make a few 13 14 more submittals. The supplement to the FSAR and 15 Amendment No. 93 is in-house right now and that's The 92 and the technical 16 what -- 92, I'm sorry. 17 specifications, they are all in right now and we are 18 working towards that.

19 There are some other programs that TVA has to make submittal, which is -- which goes into 20 21 what you mentioned with regard to the aging phenomena 22 and those types of things that we were looking at it. 23 The bottom line is we sincerely 24 appreciate the time that the ACRS gave us. We really

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understand what your concerns are. And we were groping as to what that letter needs to be. And what we wanted to get was the staff -- you know, we wanted some sort of an understanding from ACRS okay, you have a good approach. Go and do good. That's what we were hoping to get, but I do understand the reservation that you have in coming up with a letter.

8 The letter is not important to us. What 9 is very important to us is the comment that you gave us so that we will be able to address in the next 10 11 Subcommittee meeting not take as much time as we did 12 That's what we are hoping to do and to that today. 13 extent, I think, we are very satisfied with the 14 meeting.

## CHAIR RAY: Thank you.

16 MR. GIITTER: Just to add to what Rag 17 said, too, we wanted to make sure that you didn't see 18 any fatal flaws in our approach. There was no 19 expectation that you concur on Supplement 21. And I would be the first person to admit there is no meat 20 21 It's just a listing. And of course, it was in that. 22 given to you for information only. There was no 23 intent for you to concur with it.

But it doesn't really, I don't think,

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effectively demonstrate all the work that went into it. There was a lot of work, as Rags indicated. We do appreciate the opportunity to come and talk to you. We believe this is a good starting point. We do want to maintain a dialogue. And as we just talked about, we would propose to come back in the fall and give you an update.

8 Well, if you need CHAIR RAY: Okay. 9 somebody to say you need to spin up this effort and 10 mobilize quickly, might consider why we that. 11 Otherwise, unless we get turned around at the Full 12 Committee, you can plan on there not being a need for 13 a Full Committee briefing in May.

MR. GIITTER: Okay. Anything else?

15 MEMBER SIEBER: Yeah, I guess I would add 16 one thing. When we go to Watts Bar in July, I would 17 appreciate spending the bulk of our time on the Unit 18 2 construction chart as opposed to walking around the 19 accessible portion of an operating plant.

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CHAIR RAY: Yes.

21 MEMBER SIEBER: Because I think this 22 project is very important and I do think we have 23 value to add to it, if we can, but we have to 24 understand exactly what is going on.

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333 CHAIR RAY: Sure. 1 2 MEMBER STETKAR: The same thing. Also 3 message to Region II, I think it would be really good 4 when we come to talk with you. 5 MEMBER SIEBER: The same thing. MEMBER STETKAR: We will focus on mostly 6 7 on not necessarily the reactor oversight process and 8 the other plants in the region. 9 The MR. HAAG: results of our 10 inspections, yeah, or what specific plans we have. 11 MEMBER STETKAR: Because it's the big 12 plan. 13 MEMBER SIEBER: Your plans and your resources, your ability to keep up with the schedule, 14 15 all of those kinds of things. 16 Okay. With that, we will CHAIR RAY: 17 terminate the record and terminate the phone call. 18 Thank you. 19 MEMBER SIEBER: Thank you very much. Appreciate it. 20 21 (Whereupon, the meeting was concluded at 22 4:42 p.m.) 23 24 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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