

APR 28 1974

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Docket Nos. 50-438 ✓
and 50-439 ✓

John F. O'Leary, Director of Licensing

REGULATORY MANAGEMENT APPEAL MEETING WITH TVA

In a meeting concerning the Bellefonte application on April 19, 1974, TVA requested an informal Regulatory management appeal meeting on the subject of QA organization. This meeting has been scheduled for May 3, 1974 at 1:00 p.m. in Room P-422. A copy of the April 19, 1974 meeting summary is attached for your information. The following people have been invited to attend:

- | | | |
|--------------|--------------|-------------|
| E. G. Case | D. Skovholt | RO |
| A. Giambusso | R. Vollmer | OGC |
| V. A. Moore | A. Schwencer | D. K. Davis |

The meeting notice and offending staff position are also attached.

Original Signed

Don K. Davis, Project Manager
Light Water Reactors Br. 2-3
Directorate of Licensing

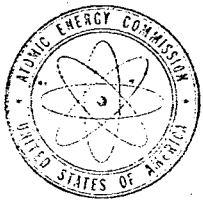
Attachments:

1. Meeting Summary dtd 4/19/74
2. Meeting Notice
3. Staff Position

- ccs: E. G. Case
A. Giambusso
V. A. Moore
D. Skovholt
R. Vollmer
A. Schwencer
OGC
RO (3)

LB

OFFICE ▶	LWR-2-3				
SURNAME ▶	DKDavis:kmf				
DATE ▶	4/ /74				



UNITED STATES
ATOMIC ENERGY COMMISSION

WASHINGTON, D.C. 20545

APR 26 1974

DOCKET NOS.: 50-438 AND 50-439

APPLICANT : TENNESSEE VALLEY AUTHORITY (TVA)

FACILITY : BELLEFONTE NUCLEAR PLANT, UNITS 1 AND 2 (BNP)

SUMMARY OF MEETING HELD ON APRIL 19, 1974 TO DISCUSS TVA'S QUALITY ASSURANCE PROGRAM

On April 19, 1974, representatives of TVA and the Regulatory staff met in Bethesda, Maryland. This meeting was arranged to clarify the Quality Assurance (QA) duties and organization associated with the Division of Construction and its onsite QA/QC inspectors (Field Engineers). The discussion included areas of interest to the Quality Assurance Branch.

A list of attendees is enclosed.

Significant points discussed are summarized below:

1. TVA Presentation

TVA's attorney for BNP presented his interpretation of recent licensing decisions on quality assurance organizations. TVA then proposed a change to their QA organization. This change involved the addition of a QA Staff Supervisor reporting to the Director of Construction with an onsite QA representative reporting to this Staff Supervisor. The onsite QA representative would be responsible for auditing the QA/QC field activities. In addition, all QA/QC personnel would have greater access to the TVA management. TVA indicated that if these changes were not adequate they would request an informal Regulatory management appeal meeting.

2. Discussions


The basic staff objection to the TVA QA organization was the potential conflict of interest that exists when Field Engineers are used as qualified inspectors. TVA field engineering functions include, performing plant layouts, field designs, field design changes and evaluation of inspection reports. The staff expressed concern that these duties and responsibilities could result, under some circumstances, in compromising the effectiveness of inspection instructions, acceptance standards and evaluation of inspection results.

The staff illustrated the situation using as an example a needed field change in the specification for spacing rebar. The Field Engineers would have authority to modify this specification on the spot and since they are also the QA inspectors there could be no independent QA on this "production type" evaluation and change. This results in no record of nonconformance. Multiple actions of this sort may compromise safety.

The staff's position is that QA/QC inspectors need to be free of field engineering responsibilities, which have cost and scheduling requirements.

3. Conclusions

TVA disagreed that any change other than the proposed change was necessary and requested an informal Regulatory management appeal meeting. The timing for this meeting was set for the first week in May, since this would allow resolution of the matter in time for documentation in the staff Safety Evaluation Report.


Don K. Davis, Project Manager
Light Water Reactors Br. 2-3
Directorate of Licensing

Enclosure:
Attendance List

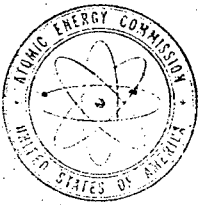
Attendance List

Atomic Energy Commission

D. K. Davis
W. D. Paton
D. J. Skovholt
R. H. Vollmer
A. M. Garland
J. G. Spraul
J. R. Costello

Tennessee Valley Authority

D. G. Powell
R. H. Davidson
J. P. Knight
H. H. Mull
W. W. Aydelott
R. C. Steffy
A. W. Crevasse
D. Magnuson
C. Bonine, Jr.



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and 50-439

APR 26 1974

A. Schwencer, Chief, Light Water Reactors Branch No. 2-3, Licensing

FORTHCOMING MEETING WITH TENNESSEE VALLEY AUTHORITY (TVA) ON BELLEFONTE
UNITS 1 AND 2

Time and Date:

1:00 p.m., Friday,
May 3, 1974

Location:

Room P-422
Bethesda, Maryland

Purpose:

Regulatory management review of the
staff position on TVA's QA organization.

Participants:

AEC (JFO'Leary, ECase, AGiambusso, VMoore,
DSkovholt, RVollmer, ASchwencer, DDavis,
OGC and RO)

TVA (Kimmons, Gilleland, Mull, Aydelott,
Powell, Knight, Steffy and Spink)

Don K. Davis, Project Manager
Light Water Reactors Br. 2-3
Directorate of Licensing

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RSBoyd	EPM	
VAMoore	WPaton	
DEisenhut	RO (3)	
RP ADs	RS (3)	

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TENNESSEE VALLEY AUTHORITY
BELLEFONTE NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-438 AND 50-439

17.0 QUALITY ASSURANCE

17.24 TVA has assigned the dual responsibility for field engineering and for inspecting to the Field Engineers reporting to the Construction Engineer who in turn reports to the Project Manager. We have concluded that this is a conflict with requirements of Criterion I of Appendix B to 10 CFR Part 50, ". . . the individual . . . inspecting . . . that an activity has been correctly performed is independent of the individual . . . directly responsible for performing the specific activity." Our information from discussions with TVA and Region II of Regulatory Operations indicates that TVA field engineering supports construction by performing the following functions: field designs, layouts, field design changes, preparation of procedures, and evaluation of inspection results.

It is our position that a conflict with Criterion I exists when an engineer is responsible for performing both engineering activities of the nature described above and inspection activities. Throughout his (the engineer's) engineering activities, such as making an engineering field change on a safety related piping system, he is in a position to make an engineering judgement on an inspection finding which deviates from the design without following the nonconformance control policy and the requirements of the QA Program. The control of the inspection function can be compromised when the individual or group responsible for performing the inspection has dual responsibilities associated with the item being inspected. Therefore, the inspection functions must be clearly separated organizationally from those individuals or groups responsible for activities associated with the item being inspected. The inspection organization must have freedom and authority to identify and document discrepancies and to assure the control of the nonconforming hardware until a formal, adequate and proper disposition has been accomplished.

For the Bellefonte QA Program, we will require organizational separation of the engineering and inspection functions with a clear delineation of the duties and responsibilities of each. Although both functions may report to the Project Manager, at the construction site, a functional tie for technical QA direction and policy must be shown between the inspectors and the independent offsite QA organization.