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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.

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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

OFFICE ▶	LWR 2-3					
SURNAME ▶	DKDavis:knf					
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