

APR 26 1974

Docket Nos. 50-438  
and 50-439✓

Tennessee Valley Authority  
ATTN: Mr. James E. Watson  
Manager of Power  
818 Power Building  
Chattanooga, Tennessee 37401

Gentlemen:

DISTRIBUTION:

AEC PDR	OParr
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LWR 2-3 Rdg	ASchwencer
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AKenneke	5 extra cps
DEisenhut	DSkovholt
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RO (3)	
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WButler	
<del>KEAIXX</del>	

In response to Regulatory staff concerns, a meeting was held in Bethesda, Maryland on April 19, 1974 at which time your representatives proposed organizational changes to the Quality Assurance Program for the Bellefonte Nuclear Plant, Units 1 and 2. After our review of your proposed organizational changes we find that additional changes are still required to meet the requirements of Criterion I of Appendix B to 10 CFR 50. Our position on this matter was expressed at the April 19, 1974 meeting and is presented in the enclosure to this letter.

At the April 19, 1974 meeting, your representatives expressed dissatisfaction with this position and requested a meeting with Regulatory management to discuss this matter. Such a meeting has been arranged with John F. O'Leary, Director of Licensing for May 3, 1974. We also expect to discuss your schedule for resolution of this matter and any resulting impact on our licensing review at this meeting.

Please contact us if you have any questions regarding the enclosed position.

Sincerely,

Original Signed

A. Schwencer, Chief  
Light Water Reactors Br. 2-3  
Directorate of Licensing

Enclosure:  
Staff Position

ccs: See next page

OFFICE ▶	LWR 2-3	L: C/LWR 2-3	L	L		
SURNAME ▶	DKDavis:kmf	ASchwencer	RVollmer	DSkovholt		
DATE ▶	4/ /74	4/ /74				

LB

James E. Watson

- 2 -

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ccs: Mr. R. H. Marquis  
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Lynchburg, VA 24505

OFFICE ▶						
SURNAME ▶						
DATE ▶						

APR 26 1974

POSITION REGARDING CONSTRUCTION PERMIT  
TENNESSEE VALLEY AUTHORITY  
BELLEFONTE NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-458 AND 50-459

17.0 QUALITY ASSURANCE

- 17.21 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.