



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

August 29, 2013

10 CFR 50.9

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Watts Bar Nuclear Plant, Unit 2
NRC Docket No. 50-391

**SUBJECT: WATTS BAR NUCLEAR PLANT (WBN) UNIT 2 - CONFIRMATORY ORDER
[NRC OFFICE OF INVESTIGATION REPORT NO. 2-2011-003] - EA-12-021 -
CONFIRMATION ACTION STATUS UPDATE**

Reference: NRC letter dated June 18, 2012, "Confirmatory Order (Effective Immediately)
[NRC Office of Investigation Report No. 2-2011-003]"

The purpose of this letter is to provide an update of the actions required by the above referenced confirmatory order. These actions were initially the result of a preliminary settlement agreement reached between NRC and TVA on May 21, 2012 to address an apparent violation. This settlement agreement was later formally documented by NRC in the above referenced letter. Although not complete with the required actions, TVA has made significant progress toward the implementation of these actions, with only the long term training items remaining to be completed. The enclosure to this letter provides the status of each confirmatory action taken by TVA. There are no new commitments contained in this letter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of August, 2013.

If you have any questions, please contact me at (423) 365-1260 or Gordon Arent at (423) 365-2004.

Respectfully,

Raymond A. Hruby, Jr.
General Manager, Technical Services
Watts Bar Unit 2

TE35
NRR

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Enclosure:

Action Status Update

cc (Enclosure):

U. S. Nuclear Regulatory Commission
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Marquis One Tower
245 Peachtree Center Ave., NE Suite 1200
Atlanta, Georgia 30303-1257

NRC Resident Inspector Unit 2
Watts Bar Nuclear Plant
1260 Nuclear Plant Road
Spring City, Tennessee 37381

**WATTS BAR NUCLEAR PLANT, UNIT 2
ENCLOSURE
ACTION STATUS UPDATE**

Confirmatory Order Commitment

- a. The Chief Nuclear Officer and the Senior Vice President of Nuclear Construction will issue a joint communication to all Nuclear Power Group and Nuclear Construction employees, including contractors and subcontractors working on a TVA site, regarding expectations for assuring work activities are performed and documented in a complete and accurate manner. The communication will be issued on or before August 1, 2012.

TVA Action Status/Action Taken:

This item is complete. A communication was sent June 19, 2012 to Nuclear Power Group and Nuclear Construction employees, contractors and subcontractors. The subject of the communication was "Completeness and Accuracy in Describing our Work is Essential and Required." This communication was signed by the Chief Nuclear Officer and the Senior Vice President, Nuclear Construction.

Confirmatory Order Commitment

- b. These expectations will be reinforced through the use of fleet wide posters and communications. Communications will specifically discuss 10 CFR 50.9, complete and accurate information, willful violations, and their consequences. Posters will be installed on or before October 1, 2012.

TVA Action Status/Action Taken:

This item is complete. Posters communicating the requirements of 10 CFR 50.9, complete and accurate information, willful violations, and their consequences were installed at Watts Bar Unit 2, Bellefonte, and TVA's Chattanooga office.

Confirmatory Order Commitment

- c. TVA will revise the existing Nuclear Power Group procedure on procedure use and adherence to reinforce the requirements of 10 CFR 50.9 and the need to ensure complete and accurate documentation of work completion steps. TVA will update major contracts to include the requirement to comply with TVA's Procedure Use and Adherence procedure. Revisions will be completed by December 21, 2012.

TVA Action Status/Action Taken:

This item is complete. Procedures NPG-SPP-01.2 (Administration of Site Technical Procedures), NC PP-1 (Watts Bar Nuclear Plant Unit 2 Procedure Control), BPP-01.2 (Administration of Site Technical Procures for Bellefonte), and BPP-01.1 (Administration of Site Technical Procedures for Bellefonte) were revised to reference 10 CFR 50.9 requirements. TVA updated major contracts to include the requirement to comply with TVA's Procedure Use and Adherence procedures by December 21, 2012.

Confirmatory Order Commitment

- d. TVA will provide 10 CFR 50.9 training (both manager/supervisor as well as craft-level) to employees, including contractor and subcontractor employees, at all Nuclear Construction (Watts Bar Unit 2 and Bellefonte) locations. Training will be completed by December 21, 2012.

TVA Action Status/Action Taken:

This item is complete except as noted. The 10 CFR 50.9 training was provided to contractor and subcontractor employees at Nuclear Construction (Watts Bar Unit 2 and Bellefonte) locations before December 21, 2012. Attached to Problem Evaluation Report 533342 was a list of 31 employees who did not receive the training because of extended sick leave, assignment to Sequoyah, or because they were part of the independent organization American Nuclear Insurers representing the American Society of Mechanical Engineers. These individuals will receive 10 CFR 50.9 training in 2013 as part of the revised general employee training.

Confirmatory Order Commitment

- e. TVA will provide refresher 10 CFR 50.9 training (both manager/supervisor as well as craft-level) to employees, including contractor and subcontractor employees, at all Nuclear Construction (Watts Bar Unit 2 and Bellefonte) locations every two years through 2016. TVA will reassess the continued need for such training thereafter.

TVA Action Status/Action Taken:

TVA will provide refresher 10 CFR 50.9 training (both manager/supervisor as well as craft-level) to employees (including contractors and subcontractors working on a TVA site) at all Nuclear Construction (Watts Bar Unit 2 and Bellefonte) locations every two years through 2016. The Problem Evaluation Report action 533342-006 has a due date of November 28, 2014 to provide this refresher 10 CFR 50.9 training in 2014. The Problem Evaluation Report action 533342-007 has a due date of November 23, 2016 to provide this refresher 10 CFR 50.9 training in 2016.

Confirmatory Order Commitment

- f. TVA will enhance existing 10 CFR 50.9-related general employee training (GET) for new employees, including contractor and subcontractor employees located at TVA nuclear sites, joining Nuclear Power Group and Nuclear Construction and update annual requalification GET training. TVA will complete this item by December 21, 2012.

TVA Action Status/Action Taken:

This item is complete. GET - Plant Access Training has been revised (effective November 16, 2012) to enhance requirements for completeness and accuracy of information (10 CFR 50.9).

Confirmatory Order Commitment

- g. Within six months of issuance of the Confirmatory Order, and again on or before July 1, 2013, TVA will perform checks of the Watts Bar Unit 2 Employee Concerns Program (ECP), to identify undue scheduling pressure issues identified by employees and employees of construction contractors and subcontractors. Issues identified will be addressed commensurate with safety and in accordance with TVA's Corrective Action Program.

TVA Action Status/Action Taken:

This item is complete. TVA performed checks of the Watts Bar Unit 2 ECP to identify undue scheduling pressure issues identified by employees and employees of construction contractors and subcontractors. A Watts Bar Unit 2 and Bellefonte employee, construction contractor and subcontractor survey consisting of eight questions was taken in December 2012. Question 8 focused on whether "Nuclear Safety has priority over schedule." Ninety-eight point four percent (98.4%) answered "Agree" or "Somewhat Agree" according to the combined responses from both Watts Bar Unit 2 and Bellefonte.

A follow-up survey was taken in May 2013 in which the same eight questions were asked. Results for Question 8 were 96.8% answering "Agree" or "Somewhat Agree" which was only a small decrease in percentages between the surveys. The total for all eight questions answering "Agree" or "Somewhat Agree" was 98.1% in December 2012 versus 96.9% in May 2013. The combined survey results were placed into a table which is attached to Problem Evaluation Report 533342.

Confirmatory Order Commitment

- h. TVA will perform an effectiveness review of actions taken and actions planned, including those taken in response to the ECP checks described in Item 5.g, on or before July 1, 2013. Based on the results of the effectiveness review, TVA will implement appropriate corrective actions.

TVA Action Status/Action Taken:

This item is complete. Attached to Problem Evaluation Report 533342 is a table showing the Watts Bar Unit 2 and Bellefonte combined survey results for both December 2012 and May 2013. There was a small decrease in percentages between the surveys ("Agree" or "Somewhat Agree") for six of the eight responses. The total percentage differential was only 1.2% less positive in May of 2013 compared to December of 2012 (Refer to Item g). All questions had a positive response exceeding 90%, with the lowest being 92.2%.

Questions 6 (i.e., I am personally responsible for performing all work in a complete and accurate manner) and 7 (i.e., A record must be complete and accurate before I sign it) of the Watts Bar Unit 2 and Bellefonte combined survey were the most relevant to the 10 CFR 50.9 training that was given in 2012. The responses to these questions showed a more positive response in May 2013 than in December 2012, although the combined positive response to these two questions in both the 2012 and 2013 surveys was above 99%.

Watts Bar Unit 2 Licensing reviewed both Level A and B Watts Bar Unit 2 and Bellefonte Problem Evaluation Reports (PERs) initiated since January 2012. The purpose was to identify potential falsification of records. Watts Bar Unit 2 Licensing also contacted Employee Concerns with the purpose of identifying any additional falsification of records. Bellefonte Employee Concerns reviewed ECP files from August 2012 through the present and no issues relating to 10 CFR 50.9 were identified. Based on the results of the review of Watts Bar Unit 2 PERs (including a second review of a 2011 PER) and Bellefonte ECP files, only Watts Bar Unit 2 PERs were identified with falsification of records. All four PERs were initiated prior to the training in 2012.

Conclusion:

At this time, TVA concludes that actions taken were effective and that the remaining actions will also be effective. Watts Bar Unit 2 Licensing has also reviewed Watts Bar Unit 2 and Bellefonte Level A and Level B PERs initiated since June 2013. No further Watts Bar Unit 2 PERs or employee concerns have been initiated concerning falsification of records since the 10 CFR 50.9 Training has been conducted. Watts Bar Unit 2 and Bellefonte combined survey questions 6 and 7 were the most relevant for the 10 CFR 50.9 Training that was given in 2012. The responses to these questions showed an increasingly more positive response in May 2013 than in December of 2012. In both Watts Bar Unit 2 and Bellefonte combined surveys, the positive response to these two questions exceeded 99%.

Confirmatory Order Commitment

- i. Upon completion of the terms of the Confirmatory Order, TVA will provide the NRC with a letter discussing its basis for concluding that the Order has been satisfied.

TVA Action Status/Action Taken:

Upon completion, TVA will provide the above letter.