



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
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ATLANTA, GEORGIA 30303-1257

November 8, 2013

Mr. Michael D. Skaggs
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SUBJECT: WATTS BAR NUCLEAR PLANT UNIT 2 CONSTRUCTION – OPERATIONAL
PREPAREDNESS INSPECTION PLAN

Dear Mr. Skaggs:

This letter is to inform you of the U.S. Nuclear Regulatory Commission (NRC) plans to inspect the areas listed in Appendix B of Inspection Manual Chapter (IMC) 2513, Light Water Reactor Inspection Program – Preoperational Testing and Operational Preparedness Phase, for Watts Bar Nuclear (WBN) Unit 2. This is in support of the overall determination regarding granting of an operational reactor license for WBN Unit 2. The purpose of the IMC 2513 Appendix B operational preparedness inspections is to verify that management controls and procedures, including quality assurance programs, security, operations, and radiological controls necessary for an operating reactor have been adequately implemented. Since many of these programs and procedures for WBN Unit 2 will be the same or nearly identical to those already established and in use for Unit 1, the NRC inspections will focus on aspects of these programs and procedures that are unique to Unit 2 or required substantive changes to cover Unit 2. The enclosed inspection plan identifies the proposed inspections for the inspection procedures listed in Appendix B of IMC 2513 and also contains the assessment results which provide the bases for reducing the inspection scope. Section 05 in IMC 2513 allows a reduction in the scope of operational preparedness inspections when applicable programs and procedures are already in use at an operating facility.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). Adams is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact us.

Sincerely,

/RA/

Robert Haag, Chief
Construction Projects Branch 3
Division of Construction Projects

Docket No. 50-391
Construction Permit No: CPPR-92

Enclosure: Watts Bar Unit 2 IMC 2513
Appendix B, "Operational
Preparedness Phase" Inspection
Plan

cc w/encl: (See next page)

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cc w/encl: (See next page)

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Letter to Michael D. Skaggs from Robert C. Haag dated November 8, 2013.

SUBJECT: WATTS BAR NUCLEAR PLANT UNIT 2 CONSTRUCTION – OPERATIONAL
PREPAREDNESS INSPECTION PLAN

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WATTS BAR UNIT 2 IMC 2513 APPENDIX B,
“OPERATIONAL PREPAREDNESS PHASE” INSPECTION PLAN

The following inspection procedures (IP) are contained in Appendix B of IMC 2513 and are grouped by functional areas. The proposed inspections to be performed for Unit 2 are provided in this enclosure.

Operations

- 36301 Operational Staffing Inspection
- 41301 Inspection of Operating Staff Training
- 42400 Plant Procedures Inspection
- 42450 Operating Procedures Inspection
- 42452 Emergency Procedures Inspection
- 71301 Technical Specifications Review

Maintenance

- 35742 QA Program - Document Control
- 35743 QA Program - Maintenance
- 35744 QA Program - Design Changes and Modifications
- 42451 Maintenance Procedures Inspection Refueling

Refueling

- 60501 Fuel Receipt and Storage

Fire Protection

- 64704 Fire Protection Program

Surveillance

- 35745 QA Program - Surveillance Testing
- 35749 QA Program - Tests and Experiments
- 35750 QA Program - Test and Measurement Equipment

Plant Water Chemistry Controls

- 79501 LWR Water Chemistry Control and Chemical Analysis (Preoperational and Supplemental)
- 79502 Plant Systems Affecting Plant Water Chemistry

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Radiological Controls

- 80521 Radiological Environmental Protection
- 83522 Radiation Protection, Plant Chemistry, Radwaste, and Environmental Organization and Management Controls
- 83523 Radiation Protection, Plant Chemistry, and Radwaste Training and Qualifications
- 83524 External Occupational Exposure Control and Personal Dosimetry
- 83525 Internal Exposure Control
- 83526 Control of Radioactive Materials and Contamination, Surveys, and Monitoring
- 83527 Facilities and Equipment
- 83528 Maintaining Occupational Exposures ALARA
- 84522 Solids - Control, Sampling, Monitoring and Release
- 84523 Liquids - Control, Sampling, Monitoring and Release
- 84524 Gases and Particulates - Control, Sampling, Monitoring, and Release
- 84525 Quality Assurance and Confirmatory Measurements for In-Plant Radiochemical Analysis (Preoperational and Supplemental)

Security and Safeguards

- 81018 Security Plan and Implementing Procedures
- 81020 Management Effectiveness
- 81022 Security Organization
- 81034 Security Program Audit
- 81038 Records and Reports
- 81042 Testing and Maintenance
- 81046 Locks, Keys, and Combinations
- 81052 Physical Barriers - Protected Areas
- 81054 Physical Barriers - Vital Areas, Material Access Areas, and Controlled Access Areas
- 81058 Security System Power Supply
- 81062 Lighting
- 81064 Compensatory Measures
- 81066 Assessment Aids
- 81070 Access Control - Personnel
- 81072 Access Control - (Power Reactors) - Packages
- 81074 Access Control - Vehicles
- 81078 Detection Aids - Protected Areas
- 81080 Detection Aids - VA, MAA, and CAA
- 81084 Alarm Stations

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- 81088 Communications
- 81400 Series Requirements for Protecting Fresh Fuel at Reactors
- 81501 Personnel Training and Qualification - General Requirements
- 81601 Safeguards Contingency Plan – Implementation Review
- 81810 Physical Protection Safeguards Information
- 85102 Material Control and Accounting - Reactor
- Quality Assurance**
- 35740 QA Program - QA/QC Administration
- 35741 QA Program - Audits
- 35746 QA Program - Procurement Control
- 35747 QA Program - Receipt Storage, and Handling of Equipment and Materials
- 35748 QA Program - Records
- 40301 Safety Committee Activity

Other

- 30301 Second Corporate Management Meeting
- 30703 Management Meetings - Exit Meeting
- 90711 Non-routine Event Review
- 91300 Title 10 Requirements
- 92701 Follow-up
- 92702 Follow-up on Corrective Actions for Violations and Deviations
- 92703 Follow-up of Confirmatory Action Letters
- 94300 Inspection Preparatory to Operating License Issuance
- 92719 Safety Evaluation Report Review and Follow-up

Notes:

The ‘other’ IP category is not covered in this enclosure/ discussion since these are general guidance and ‘as needed’ IPs.

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OPERATIONS	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
36301; Operational Staffing	<p><u>Assessment Results:</u> Unit 1 has existing, established programs in place that specify qualification requirements for the staffing positions and areas covered by this IP. Many of the Unit 2 staff positions listed in the IP are already functioning in their capacity for Unit 1, therefore, the focus of inspection per this IP will be for individuals that are new to their position.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Determine which standard the site is committed (ANSI N18.1 has been superseded by ANS 3.1). • Determine if additional staff is required. • Verify staff is qualified per the applicable standard. • Review 10% of the staff required by the standard to ensure that they meet the minimum requirements of the standard.
41301; Pre-licensing Review of Training and Qualification Programs and/or 41500; Training Program Effectiveness	<p><u>Assessment Results:</u> Unit 1 has existing, established training programs in place for licensed operators and non-licensed operations staff. Aspects of these programs have been reviewed by the NRC as part of the licensed operator examination process and during inspection of the licensed operator requalification program which is part of the Reactor Oversight Process (ROP). The acceptability of existing Unit 1 training programs to cover Unit 2 licensed operator and non-licensed staff is supported, in part, by Unit 2 systems and equipment being very similar to Unit 1. In addition, the site is already under the Institute of Nuclear Power Operations Training Accreditation program.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Evaluate TVA's training plan to: 1) confirm unit differences are incorporated into their training program; and 2) confirm the training materials, test items, and training delivery are consistent with the licensee's 2010 Operator Training and Certification Program Proposal (ADAMS ML111010586).
42400B; Plant Procedures	<p><u>Assessment Results:</u> TVA has a well-established program for writing and controlling procedures that are covered in the various categories listed in the IP. Procedures developed under this program have been implemented for Unit 1 since the plant became operational in the mid-1990's. In addition, plant procedures covered by this IP will be reviewed as part of the inspections for the other Operational Preparedness areas in Appendix B of IMC 2513.</p>

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	<p><u>Inspection Scope:</u> Based on the above, no additional inspection is necessary for IP 42400B.</p>
<p>42450B; Operating Procedures</p>	<p><u>Assessment Results:</u> TVA has a well-established program for writing and controlling procedures in the various categories listed in the IP. Procedures developed under this program have been implemented for Unit 1 since the plant became operational in the mid-1990's. Furthermore, procedure adequacy is routinely evaluated in several ROP inspection procedures including 71111.11.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Review a sample of applicable procedures. The sample should cover each of the areas defined in the IP and approximate 10% of those available. • Compare the procedures to Unit 1 and verify unit differences have been incorporated and ensure the criteria for procedure development in Regulatory Guide 1.33 criteria is met.
<p>42452B; Emergency Procedures</p>	<p><u>Assessment Results:</u> TVA has a well-established program for writing and controlling procedures for abnormal conditions, off normal conditions, alarm conditions, emergencies or other significant events. Procedures developed under this program have been implemented for Unit 1 since the plant became operational in the mid-1990's. Furthermore, ROP inspection procedures 71111.11 and 71114 evaluate procedures covered by this IP.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Review a sample of applicable emergency procedures (EOPs, AOPs, and all Control Room annunciators). The sample should cover each of the areas defined above and include 5-10 procedures in each area. • Compare the procedures to Unit 1 and verify unit differences have been incorporated and ensure the criteria for procedure development in Regulatory Guide 1.33 criteria is met.
<p>71301; Technical Specification Review</p>	<p><u>Assessment Results:</u> Unit 1 has existing, established Technical Specifications in place that are clear, enforceable, and accurately reflect the Unit 1 installed systems. Unit 2 Technical Specifications were developed based on the Unit 1 Technical Specifications, then modified to reflect differences on Unit 2.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Compare Unit 1 and Unit 2 Technical Specifications to identify differences. Ensure unit differences are identified appropriately. • Perform walkdown inspections of Unit 2 to verify that covered systems conform to Technical Specifications. For efficiency, this inspection can be combined with other as-built inspections, e.g. IP 37301.

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MAINTENANCE	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
<p>35742; QA Program-Document Control</p>	<p><u>Assessment Results:</u> The document control program is common for both units. Document control activities for Unit 2 have been inspected under IMC 2512 via IP 35100. Furthermore, under ROP inspections, document control is routinely evaluated. As part of performance based inspections, the inspectors typically verify that documents/procedures associated with work are correct.</p> <p>This IP recognizes that a limited scope inspection is appropriate for a second plant that is located at a site where this IP was previously inspected for the first plant.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Perform Section II.2 of IP 35742 (Implementation)
<p>35743; QA Program-Maintenance</p>	<p><u>Assessment Results:</u> Existing programmatic controls that cover maintenance activities for Unit 1 and common equipment will be utilized for Unit 2 equipment. This program is well-established and has been implemented under Unit 1 for approximately 16 years. The motor operated valve (MOV) program and related generic communication initiatives are part of the NRC’s Unit 2 construction inspection effort. Observations/ inspection of maintenance activities under the ROP focus on maintenance effectiveness and post maintenance testing inspections.</p> <p>This IP recognizes that a limited scope inspection is appropriate for a second plant that is located at a site where this IP was previously inspected for the first plant.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Perform inspections that verify Unit 2 equipment has been entered into the preventive maintenance (PM) program and master schedule in a manner that is consistent with Unit 1 and common equipment. Place additional emphasis on unique Unit 2 equipment. • Perform Section II.2.c of the IP. • Obtain from TVA a list of unique Unit 2 safety-related equipment. Assess the completeness of this list and verify appropriate PMs have been established.

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<p>35744; QA Program- Design Changes and Modifications</p>	<p>Assessment Results: For activities covered by this IP, TVA has well-established programs that have been implemented under Unit 1. The design control process in place during construction of Unit 2 has been thoroughly inspected under IMC 2512 inspections via IPs 35060, 35960, & 37055. For Unit 1, the design control process is a mature program that is routinely inspected under the ROP program. The temporary modification process is established under Unit 1 and is also inspected under the ROP program. TVA plans to use this existing temporary modification process for Unit 2 when it becomes operational.</p> <p>This IP is required to be completed within the first six months after the license is issued. It is noted that sufficient samples may not be available (there are typically very few modifications performed online and very few temporary modifications). This IP recognizes that a limited scope inspection is appropriate for a second plant that is located at a site where this IP was previously inspected for the first plant.</p> <p>Inspection Scope: Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 has been incorporated into the temporary modifications program by reviewing the applicable program procedure. • Complete implementation sections II.1.b, and II.2.b, as allowed, based on the number of samples available within the first six months of operation.
<p>42451; Maintenance Procedures Inspection</p>	<p>Assessment Results: TVA has well-established maintenance procedures that have been successfully used for Unit 1 and common equipment. The majority of Unit 2 equipment is identical or very similar to the counterpart equipment in Unit 1. Observations/inspection of maintenance activities under the ROP focus on maintenance effectiveness and post maintenance testing inspections.</p> <p>Inspection Scope: Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm TVA has reviewed Unit 2 structures, systems and components (SCCs) for any unique equipment that would not be covered under existing maintenance procedures and has issued new procedures for this equipment. • Review 5-7 of these procedures (or all that are available if less than 5) using the applicable guidance in the IP.

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REFUELING	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
60501; Fuel Receipt and Storage	<p><u>Assessment Results:</u> TVA has well-established controls for fuel receipt, storage, and security that were used for the initial Unit 1 core and during subsequent fuel shipments that support periodic refueling. These same controls were used for the shipment of Unit 2 fuel that occurred in 2011. There is a common spent fuel pool at Watts Bar that will service both Unit 1 and Unit 2.</p> <p>Fuel receipt inspections have already been performed for 4 containers that shipped Unit 2 fuel to the site; see NRC Inspection Reports 05000391/2011605 (C.1.7 – 2 samples) and 05000391/2011607 (C.1.6 – 2 samples). No findings were identified in these inspections.</p> <p><u>Inspection Scope:</u> Based on the above, no additional inspection is necessary for IP 60501.</p>

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FIRE PROTECTION	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
64704; Fire Protection Program	<p><u>Assessment Results:</u> The fire protection program is common for both units. Unit 2 construction credited some of the existing fire protection program elements that were already in-place for Unit 1. Under ROP inspections, the Unit 1 fire protection program is routinely evaluated quarterly, annually and triennially. As part of performance based inspections, the inspectors typically verify that the Appendix R/Fire Protection Program is being maintained. Quarterly inspections of the fire protection program, as it applies to Unit 2 construction activities, have been performed under the guidance of IP 64051 since the resumption of Unit 2 construction in 2008. Significant changes were made to the Fire Protection Report in an effort to transition from the report being a single unit document to a dual unit document. These changes may have impacts on Unit 1 as well as Unit 2. It is necessary to understand the changes to the program and their impacts on both Units.</p> <p><u>Inspection Scope:</u> As described below, portions of this IP and other inspection initiatives will encompass the NRC’s fire protection inspection plans for Unit 2.</p> <ul style="list-style-type: none"> • Efforts should be made to have the licensee identify which elements of the WB2 Fire Protection Program are the same as those currently in place and approved for WB1. Using IP 64704 as guidance, inspectors should independently verify a sample of those items to ensure that they are indeed implemented in the same manner (procedures for handling the combustible controls program, fire watches, compensatory actions, fire brigade, fire watches, etc.). • Request and review a sample of changes that were made to the fire protection program/report to accommodate Unit 2 that may have had impacts on Unit 1. Perform inspections specified in IP 64704 that are determined to be applicable for Unit 2. • For those program elements that are unique to WB2, inspectors should review and inspect those items (operator manual actions, multiple spurious operations, dedicated safe shutdown path, etc.) in accordance with IP 64100, Post-fire Safe Shutdown, Emergency Lighting and Oil Collection Capability at Operating and Near-term Operating Reactor Facilities. • Using IP 71111.05T, Fire Protection (Triennial) as a guide, select 3-5 risk significant fire areas, including Unit 1/2 common areas and Unit 2 only areas, where possible and perform inspection activities identified in the inspection procedure to verify the Appendix R / Fire Protection Program is implemented as specified in the approved Fire Protection Report. Place additional emphasis on unique Unit 2 fire protection and safe shutdown equipment, procedures, barriers, manual actions, etc.

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SURVEILLANCE	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
<p>35745; QA Program-Surveillance Testing and Calibration Control</p>	<p>Assessment Results: TVA has well-established surveillance testing and calibration programs that have been successfully implemented for Unit 1 and common equipment. The existing Unit 1 testing and surveillance program (including calibrations) will be expanded to include Unit 2 equipment. Once this is verified, certain portions of the ‘program review’ inspection will not be required. The IP states, if necessary, that inspection of the implementation portions of the IP may be deferred until after an operating license is issued, but should be completed within the first six months of operation, however, it is recommended that we attempt to perform the initial surveillances and calibrations inspection prior to startup. Inspection of in-service testing is covered by construction inspection using IP 73756 and inspection associated with Generic Letter 89-04, therefore this area will not be inspected as part of this IP. This IP recognizes that a limited scope inspection is appropriate for a second plant that is located at a site where this IP was previously inspected for the first plant.</p> <p>Inspection Scope: Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Complete implementation sections, II.1.b and II.2.b in their entirety. • Complete program review sections II.1.a.1 and II.2.a.1 to verify that either Unit 2 equipment has been added to the existing master schedule(s) <u>or</u> that a comparable master schedule(s) has been established for Unit 2 equipment. • Verify that the existing Unit 1 testing and surveillance programs (including calibrations) have been expanded to include Unit 2 equipment.
<p>35749; QA Program-Tests and Experiments</p>	<p>Assessment Results: General test and experiment program requirements for Unit 1 are well-established. TVA’s 50.59 program for Unit 1 has been routinely inspected under IP 71111.17T (currently a triennially ROP inspection). The existing Unit 1 test and experiment controls will be expanded to include Unit 2 activities. Once this is verified, the ‘program review’ inspections of this IP will not be required. The IP also states that the implementation portion may be deferred to within the first six months of operation since the requirements are only applicable during operations.</p> <p>Inspection Scope: Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Verify that the existing Unit 1 tests and experiment controls program has been expanded to cover

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	<p>Unit 2 activities. Based on this verification being completed, inspection of the ‘program review’ section of the IP (II.1.a) and the conduct of interviews specified in section II.1.b (1) are not required.</p> <ul style="list-style-type: none"> • Perform the implementation Section II.1.b (2) within the first six months of operation, if samples are available.
<p>35750; QA Program-Measuring and Test Equipment</p>	<p><u>Assessment Results:</u> TVA has a well-established program for the control of measuring and test equipment (M&TE) that has been successfully implemented for activities involving Unit 1 and common equipment. Unit 2 construction activities use M&TE that is provided and controlled under the existing Unit 1 program. This was verified during an NRC inspection conducted in the 1st quarter of 2012 (Inspection Report 05000391/2012-602). TVA plans to continue the use of M&TE controlled under the Unit 1 program for the remainder of the Unit 2 construction project (this will include Unit 2 preoperational and startup testing activities) and once Unit 2 becomes operational.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Verify that Unit 2 preoperational and startup testing activities utilize M&TE that is covered under the existing Unit 1 site program, or, if this cannot be verified, implement this IP for preoperational and startup testing. • Verify that the existing site M&TE program covers Unit 2 activities, once Unit 2 becomes operational, no inspection further inspection is required under this IP, or, perform this IP if a new or different M&TE program will be used for Unit 2 operations.

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CHEMISTRY	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
<p>79501; LWR Water Chemistry Control and Chemical Analysis-Audits</p>	<p><u>Analysis of IP Requirements:</u> The existing chemistry control program for Unit 1 will also be used for Unit 2. Once this is verified, the ‘program review’ inspections of this IP will not be required. While the chemistry control program has not received routine NRC review, significant problems have not occurred related to the Unit 1 program.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 has been appropriately incorporated into the existing Chemistry Control Program. • Observe sample collection for Unit 2 primary water, secondary water, closed cooling water and the refueling water storage tank to verify the representativeness of each sample. • Review the Unit 2 continuous on-line instrumentation for high purity water including pH, conductivity, and sodium. This review should include physical instrument, procedures and calibration documentation. • Based on availability, review a sample of the following Unit 2 records: <ul style="list-style-type: none"> - Audits and appraisals of Unit 2 chemistry controls and associated corrective actions - Records of maintenance and calibration of continuous (on-line) monitors - Results of inter-laboratory cross-checks - Records of blind, spike, and replicate samples - Records associated with the use of control charts - Records demonstrating the use of approved laboratory procedures for chemical analysis including instrument calibration, preventive maintenance, and operation
<p>79502; Plant Systems Affecting Plant Water Chemistry</p>	<p><u>Analysis of IP Requirements:</u> The existing chemistry control program for Unit 1 will also be used for Unit 2. Once this is verified, the ‘program review’ aspects of this IP will not be inspected. While the chemistry control program has not received routine NRC review, significant problems have not occurred related to the Unit 1 program.</p>

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Inspection Scope: Based on the above, this IP will be used as guidance to complete the following:

- Confirm that Unit 2 has been appropriately incorporated into the existing Chemistry Control Program.
- Perform sections 02.02 and 02.03 of this IP.

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RADIATION PROTECTION	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
80521; Radiological Environmental Monitoring	<p><u>Analysis of IP Requirements:</u> Radiological Environmental Monitoring Program (REMP) and Meteorological (MET) monitoring programs guidance and implementation are expected to be common for both units. The REMP and MET Monitoring Program are routinely inspected under the ROP for Unit 1 using IP 71124.07. As part of these performance based inspections, the inspectors typically verify that documents/ procedures and program implementation are adequate.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 has been appropriately incorporated into the existing REMP and MET programs. • Review the REMP and MET programs and any proposed changes due to Unit 2 activities against the current programs in place for Unit 1 operations.
83522; Radiation Protection Plant Chem, Radwaste, & Environmental Organization and Mgmt Controls	<p><u>Analysis of IP Requirements:</u> The radiation protection and chemistry programs along with corresponding organizational and management controls are expected to be common for both units. The radiation protection, radioactive material control, radwaste, and environmental monitoring program areas are routinely inspected under the ROP for Unit 1 using IPs 71124.01 - 08. As part of these performance based inspections, organizational structure and responsibilities are indirectly reviewed.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 has been appropriately incorporated into the existing radiation protection program. • Review changes/ proposed changes to the current Unit 1 radiation protection program and organizational structures. Assess the adequacy of these changes to support startup of Unit 2.

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<p>83523; Radiation Protection, Plant Chemistry, Radwaste Training and Qualifications</p>	<p><u>Analysis of IP Requirements:</u> Training program guidance and its implementation for areas covered by this IP are expected to be common for both units. Training program activities covered by the IP are not routinely inspected as part of the ROP baseline inspection program.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 training and qualification items covered by the IP have been appropriately incorporated into the existing Unit 1 programs. • Inspect the training and qualification efforts for staff newly hired to support the increased workload in radiation protection, and radioactive material activities caused by Unit 2 operations. • Verify appropriate radiation protection training and qualification for staff (RP, I&C, and Maintenance) involved with new/upgraded models of Unit 2 effluent radiation monitoring equipment.
<p>83524; External Occupational Exposure Control and Personal Dosimetry</p>	<p><u>Analysis of IP Requirements:</u> The external occupational exposure control and personal dosimetry programs are expected to be common for both units. External occupational exposure control and personal dosimetry usage are routinely inspected under the ROP for Unit 1 using IPs 71124.01 and 71124.04. As part of these performance based inspections, the inspectors typically verify that documents/ procedures related to these IPs and implementation are adequate.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 external occupational exposure control and personal dosimetry activities covered by the IP have been appropriately incorporated into the existing Unit 1 programs. • Review changes/ proposed changes to the current Unit 1 external exposure control and personal dosimeter programs. Assess the adequacy of these changes to support startup of Unit 2. • Perform section 02.01 of this IP.
<p>83525; Internal Exposure Control</p>	<p><u>Analysis of IP Requirements:</u> Internal exposure control guidance and implementation are expected to be common for both units. Internal exposure control activities for Unit 1 are routinely inspected under the ROP for Unit 1 using IPs 71124.01 and 71124.03. As part of these performance based inspections, the inspectors typically verify that internal exposure control documents and procedures are adequate and implementation is acceptable.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 internal exposure control activities covered by the IP have been appropriately incorporated into the existing Unit 1 programs.

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	<ul style="list-style-type: none"> • Review changes/ proposed changes to the current Unit 1 internal exposure control program. • Assess the adequacy of these changes to support startup of Unit 2.
<p>83526; Control of Radioactive Materials & Contamination, Surveys & Monitoring</p>	<p><u>Analysis of IP Requirements:</u> Guidance for the control of radioactive materials and contamination, surveys, and monitoring and associated implementation are expected to be common for both units. Activities within these areas are routinely inspected under the ROP for Unit 1 using IPs 71124.01 - 04. As part of these performance based inspections, the inspectors typically verify that documents and procedures related to these IPs are adequate and are implemented appropriately.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that Unit 2 control of radioactive materials and contamination, surveys, and monitoring activities covered by the IP have been appropriately incorporated into the existing Unit 1 programs. • Review changes/ proposed changes to the current Unit 1 control of radioactive materials and contamination, surveys, and monitoring programs. Assess the adequacy of these changes to support startup of Unit 2.
<p>83527; Facilities and Equipment</p>	<p><u>Analysis of IP Requirements:</u> <u>Note:</u> This IP addresses facilities and equipment for radiation protection activities that are not covered by other IPs.</p> <p>Radiation protection facilities and equipment used during routine, outage, and non-routine operations are expected to be common for both units. Facilities and equipment in support of the RP programs have been routinely inspected under the ROP for Unit 1 using IPs 71124.01 - 05. As part of these performance based inspections, the inspectors typically verify that documents, procedures, and implementation related to these facilities and equipment are correct.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that facilities and equipment covered by this IP, that are needed to support the Unit 2 RP programs, have been appropriately incorporated into the existing Unit 1 programs. • Review the status and/or changes made to current Unit 1 facilities and equipment that are covered by this IP, and verify they are adequate to support startup of Unit 2.
<p>83528; Maintaining Occupational Exposures</p>	<p><u>Analysis of IP Requirements:</u> The as low as reasonably achievable (ALARA) program is expected to be common for both units. ALARA program activities have been routinely inspected under the ROP for Unit 1 using IP 71124.02. As part of these performance based inspections, the inspectors typically verify that ALARA documents and</p>

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ALARA	<p>procedures are adequate and that the ALARA program is properly implemented.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Confirm that the ALARA program has been revised to cover Unit 2 activities. • Review the changes/ proposed changes to the ALARA program and verify they are adequate to support startup of Unit 2.
84522; Solid Wastes	<p><u>Analysis of IP Requirements:</u> The majority of the solid waste processing system and waste disposal program guidance and implementation are expected to be common for both units. Solid waste processing system, waste disposal, and transportation activities for Unit 1 have been routinely inspected under the ROP using IP 71124.08. As part of these performance based inspections, the inspectors typically verify the adequacy of documents and procedures associated with solid waste and that solid waste activities are implemented correctly.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Evaluate any Unit 2 preoperational testing conducted to demonstrate solid waste piping integrity, system piping flow characteristics and operability, and process monitor operability. • Evaluate licensee program guidance for determining Unit 2 waste source terms and characteristics for burial and transportation activities. • Review the current Unit 1 solid waste processing system and waste disposal system components and processing and compare against changes/proposed changes required to support Unit 2 solid waste activities. If Unit 1 contains/shares processing equipment with Unit 2, evaluate shared equipment configuration, material condition, and testing that demonstrates capability to support dual unit operations. For Unit 2 specific solid waste SSCs, perform similar evaluations. • As applicable, evaluate the licensee’s evaluation/testing associated with Unit 2 piping integrity, input flows and waste characteristics on the solid waste processing system (Note: this may be conducted under IP 84523). • Evaluate all implemented or proposed changes to solid waste process and effluent monitoring systems including: 50.59 screenings; detector calibrations and sensitivities; flow meter calibration; system configuration and material condition, RP, CHEM, IC procedures for system maintenance and surveillances to meet TS and ODCM requirements. • Review training provided to staff and procedural adequacy for any new systems. <p>Note: Liquid input from Unit 2 operations to the solid waste processing system should be reviewed in detail regarding Unit 2 piping systems configuration and material condition; process and effluent monitor operability; and liquid waste chemical and source term characteristics; impact on radwaste processing and disposal.</p>

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84523; Liquids
& Liquid Wastes

Analysis of IP Requirements:

Much of the liquid waste monitoring system (LWMS), e.g., holdup/release tanks and radiation monitors will be common to both units. Therefore, inspections under this IP will focus on Unit 2 SSCs having input to Unit 1/Unit 2 common LWMS SSCs, e.g., drains, piping, sumps, holdup tanks and radiation monitors etc. In addition, changes implemented or proposed for associated process/effluent radiation monitoring instrumentation will be inspected in detail. The operational LWMS program activities for Unit 1 have been routinely inspected under the ROP using IPs 71124.05 - 06. Much of the general liquid effluent program frame-work should be similar to Unit 1 programs, but many of the details including Unit 2 piping, tanks and radiation monitoring system configurations, material condition and operability will be reviewed in detail.

Inspection Scope: Based on the above, this IP will be used as guidance to complete the following:

- Verify that liquid waste monitoring systems are operable and that documents, procedures are adequate for Unit 2 liquid effluent processing and release activities.
- Review current Unit 1 LWMS processing and monitoring SSCs against Unit 2 FSAR system descriptions, and against expected Unit 2 program activities. If Unit 2 contains processing LWMS equipment not inspected under Unit 1 operations, evaluate equipment configuration and material condition.
- As applicable, evaluate licensee’s evaluation/testing associated with Unit 2 SSCs including piping integrity, input flows and liquid waste characteristics on processing and monitoring liquid radioactive wastes.
- Evaluate all implemented or proposed changes to liquid waste process and effluent monitoring systems including: design change packages (50.59 screenings) for modifications from original design; installed Unit 2 SSC configuration and material condition; detector calibrations, sensitivities, & set-points; flow meter calibration; RP, CHEM, I&C procedures for system maintenance and surveillances to meet Technical Specifications and Offsite Dose Calculation Manual requirements.
- Review training provided to staff and procedural adequacy for any new systems associated with Unit 2 operations.

Note: Liquid input from Unit 2 operations to the solid waste processing system should be reviewed in detail regarding installed Unit 2 piping systems configuration and material condition; process and effluent monitor operability; and liquid waste chemical and source term characteristics; impact on liquid effluent processing and monitoring.

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84524;
 Gaseous Waste
 System

Analysis of IP Requirements:

Much of the gaseous waste monitoring system (GWMS) SSCs, e.g., waste gas decay tank (WGDT) and radiation monitors, will be common to both units. Therefore, inspection in this IP will focus on Unit 2 SSCs having input to Unit 1/Unit 2 common SSCs, e.g., piping, headers, and radiation monitors. In addition, changes implemented or proposed for associated process/effluent radiation monitoring instrumentation need to be inspected in detail. The operational GWMS program activities for Unit 1 have been routinely inspected under the ROP using IPs 71124.05 - 06. Much of the general gaseous effluent program framework in support of Unit 2 operations will be similar to existing Unit 1 programs, therefore, the Unit 2 specific items including piping, tanks and radiation monitoring system configurations, material condition and operability will be reviewed in detail.

Inspection Scope: Based on the above, this IP will be used as guidance to complete the following:

- Verify that gaseous waste systems are operable and that documents/ procedures are adequate for Unit 2 gaseous effluent processing and release activities.
- Review current Unit 1 GWMS processing and monitoring SSCs against Unit 2 FSAR system descriptions, and against expected Unit 2 program activities. If Unit 2 contains GWMS equipment not inspected under Unit 1 operations, evaluate equipment configuration and material condition.
- As applicable, evaluate TVA's evaluation/testing associated with Unit 2 SSCs including piping integrity, input flows and gaseous waste characteristics on processing and monitoring gaseous effluent releases.
- Evaluate all implemented or proposed changes to gaseous waste process and effluent monitoring systems including: design change packages (50.59 screenings) for modifications from original design; installed Unit 2 SSC configuration and material condition; detector calibrations, sensitivities, & set-points; flow meter calibration; RP, CHEM, IC procedures for system maintenance and surveillances to meet TS and ODCM requirements.
- Review training provided to staff and procedural adequacy for any new systems associated with Unit 2 operations.

Note: Gaseous waste input from Unit 2 operations to GWMS should be reviewed in detail regarding installed Unit 2 piping systems configuration and material condition; process and effluent monitor operability; and liquid waste chemical and source term characteristics; and impact on gaseous liquid effluent processing and monitoring

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84525; QA and Confirmatory Measurements for In-Plant Radiochemical Analysis	<p><u>Analysis of IP Requirements:</u> The programs and processes for radioactivity measurements under normal and emergency conditions and chemical measurements under emergency conditions are expected to be common for both units. QA program activities for these areas are also expected to be common for both units. Therefore, inspection per this IP will focus on program and hardware changes that support Unit 2 radiochemical analyses activities. Confirmatory measurement activities and related QA activities for Unit 1 have been routinely inspected under the ROP using IPs 71124.06 and 71124.07. As part of these performance based inspections, the inspectors typically verify that procedures, documents, program implementation, and accuracy of measurements are acceptable.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none">• Confirm that Unit 2 radiochemical analysis activities have been appropriately incorporated into the existing Unit 1 programs.• Review the status and/or changes made to current Watts Bar radiochemical analysis programs, procedures, supporting systems and equipment and verify they are adequate to support startup of Unit 2.
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SECURITY AND SAFEGUARDS

Because NRC inspection plans in the security and safeguards areas contains Security-Related Information in accordance with 10 CFR 2.390(d)(1) and its disclosure to unauthorized individuals could present a security vulnerability, the security inspection plans for WBN Unit 2 are not included in this attachment. Additionally, the detailed security related inspection plan will not be made available electronically for public inspection in the NRC Public Document Room or from the PARS component of NRC's ADAMS. NRC Region II staff will contact TVA directly to convey the plans for performing security inspection for Unit 2.

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QUALITY ASSURANCE	
Inspection Procedure No. and Title	Assessment Results/ Inspection Scope
<p>35740; QA Program-QA/QC Administration</p>	<p><u>Analysis of IP Requirements:</u> General QA/QC administrative controls are well-established and have been implemented in support of Unit 1 operations. TVA intends to use the same QA/QC administrative controls for Unit 2 operations. The overall QA program for construction was assessed as part of the Readiness Inspection in 2008 (IIR 05000391/2008006)</p> <p><u>Inspection Scope:</u> Based on verification that Unit 1 QA/QC administrative controls will be applied to Unit 2 after construction is completed, no inspection is required by this IP.</p>
<p>35741; QA Program-Audits</p>	<p><u>Analysis of IP Requirements:</u> The requirements for the Unit 1 QA audit program are well-established and have been implemented in support of Unit 1 operations. TVA intends to use the same QA audit program for Unit 2 operations. The overall QA program for construction was assessed as part of the Readiness Inspection in 2008 (IIR 05000391/2008006 and QA audits were specifically discussed in sections Q.1.1 and Q.1.2 of the report). On a routine basis, various Unit 2 construction inspections have reviewed QA audits that were performed in the particular area of inspection.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Continue to review QA audits as part of ongoing construction inspections. • Perform implementation sections II.2.a and II.2.b with a focus on preoperational testing activities and changes to site-wide programs that will support Unit 2 transition from construction to operations. • Based on verification that Unit 1 QA audit program will be applied to Unit 2 after construction is completed, no additional inspections are required by this IP.
<p>35746; QA Program-Procurement Control</p>	<p><u>Analysis of IP Requirements:</u> The procurement program requirements for Unit 1 are well-established in support of Unit 1 operations. TVA intends to use the same procurement program for Unit 2 operations. Procurement activities for Unit 2 have been inspected during numerous construction inspections. While Unit 1 and Unit 2 construction procurement is performed by different groups, there are many common features between the two different procurement groups and some common procurement instructions are used by both groups. Because the</p>

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	<p>procurement program that will support Unit 2 after construction is not required until a license is issued, some aspects of the implementation portions of this IP may be deferred if necessary until sufficient samples are available, but should be completed within 6-months of operations.</p> <p><u>Inspection Scope:</u> Based on the above, this IP will be used as guidance to complete the following:</p> <ul style="list-style-type: none"> • Continue to inspect Unit 2 procurement activities as specified by the various IMC 2512 IPs. • Perform implementation section II.2.b for Unit 2 safety-related items that have been procured by the organization that will support Unit 2 once it becomes operational. • Perform implementation section II.2.c with a focus on suppliers of components that are unique to Unit 2. • Perform implementation section II.2.d for an audit that was performed on a supplier of components that are unique to Unit 2. • Based on verification that the Unit 1 procurement program will be applied to Unit 2 after construction is completed, no additional inspections are required by this IP.
<p>35747; QA Program- Receipt, Storage, and Handling of Equipment and Material</p>	<p><u>Analysis of IP Requirements:</u> The receipt, storage, and handling of equipment and material program requirements for Unit 1 are well-established in support of Unit 1 operations. TVA intends to use the same receipt, storage, and handling program for Unit 2 operations. Equipment and material receipt, storage, and handling activities for Unit 2 have been inspected during numerous Unit 2 construction inspections. While Unit 1 and Unit 2 equipment and material receipt, storage, and handling are performed by different groups, there are many common features between the two different groups and some common procedures/instructions are used by both groups.</p> <p><u>Inspection Scope:</u> Based on the above, inspection of this IP will be completed in part as follows:</p> <ul style="list-style-type: none"> • Continue to inspect Unit 2 equipment and material receipt, storage, and handling activities as specified by the various IMC 2512 IPs. • Perform implementation section II.2.b for Unit 2 safety-related items that have been received, stored and handled by the organization that will support Unit 2 once it becomes operational. • Perform implementation section II.2.c (if samples are available at an offsite warehouse) with a focus on suppliers of components that are unique to Unit 2. • Perform implementation section II.2.d for an audit that was performed on a supplier of components that are unique to Unit 2. • Based on verification that the Unit 1 procurement program will be applied to Unit 2 after construction is completed, no additional inspections are required by this IP.

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<p>35748; QA Program- Records</p>	<p><u>Analysis of IP Requirements:</u> The records storage program for Unit 1 is well-established in support of Unit 1 operations and is currently being used for Unit 2 records. Records are routinely reviewed and assessed for adequacy as part of Unit 2 construction inspections. Also, record reviews are included in all the system and primary preoperational tests that are selected for inspection under the guidance of IMC 2513.</p> <p><u>Inspection Scope:</u> Based on the above, inspection of this IP will be completed in part as follows:</p> <ul style="list-style-type: none"> • Perform implementation inspections specified in section II.2.b.
<p>40301; QA Program- Safety Committee Activity</p>	<p><u>Analysis of IP Requirements:</u> The program requirements for safety review committees are well-established under the Unit 1 organization and are expected to be common for both units once construction and preoperational testing is completed for Unit 2. IP 40301 stipulates that the IP does not need to be inspected for subsequent units at the same site when the initial safety committees are common to all units.</p> <p><u>Inspection Scope:</u> Based on the above, inspection of this IP will be completed in part as follows:</p> <ul style="list-style-type: none"> • Upon confirmation that Unit 2 has been incorporated into the established safety review committee program at Watts Bar, no additional inspections are required.

EMERGENCY PREPAREDNESS

Note: Inspections in the area of emergency preparedness (EP) are not included in Appendix B of IMC 2513, however, inspections to verify TVA’s EP readiness for Unit 2 once it becomes operational were identified as part of the Unit 2 licensing review process. NUREG-0847 SER supplement 22 was issued on February 8, 2011. Section 13.3 discusses the EP review and contains the following action items that require additional NRC staff review and/or inspection. Appendix HH is part of each NUREG-0847 SER supplement and maintains a listing and status (either open or closed) for all action items identified during the licensing review process. The number listed by each item corresponds to the item number assigned in Appendix HH.

APPENDIX HH items:

- (37) The NRC staff will review the combined WBN Unit 1 and 2 Appendix C prior to issuance of the Unit 2 OL to confirm (1) that the proposed Unit 2 changes were incorporated into Appendix C, and (2) that changes made to Appendix C for Unit 1 since Revision 92 and the changes made to the NP-REP since Revision 92 do not affect the bases of the staffs findings in this SER supplement. (Section 13.3.2) *HQ/NSIR has lead for closing this item.*
- (38) The NRC staff will confirm the availability and operability of the ERDS for Unit 2 prior to issuance of the Unit 2 OL. (Section 13.3.2.6).
- (39) The NRC staff will confirm the adequacy of the communications capability to support dual unit operations prior to issuance of the Unit 2 OL. (Section 13.3.2.6) (CLOSED in Integrated Inspection Report (IIR) 05000391/2011609).
- (40) The NRC staff will confirm the adequacy of the emergency facilities and equipment to support dual unit operations prior to issuance of the Unit 2 OL. (Section 13.3.2.8).
- (41) TVA committed to (1) update plant data displays as necessary to include Unit 2, and (2) to update dose assessment models to provide capabilities for assessing releases from both WBN units. The NRC staff will confirm the adequacy of these items prior to issuance of the Unit 2 OL. (Section 13.3.2.9).
- (42) The NRC staff will confirm the adequacy of the accident assessment capabilities to support dual unit operations prior to issuance of the Unit 2 OL. (Section 13.3.2.9) (CLOSED in IIR 05000391/2011609).
- (43) Section V of Appendix E to 10 CFR Part 50 requires TVA to submit its detailed implementing procedures for its emergency plan no less than 180 days before the scheduled issuance of an operating license. Completion of this requirement will be confirmed by the NRC staff prior to the issuance of an operating license. (Section 13.3.2.18) *HQ/NSIR has lead for closing this item.*