



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

February 20, 2014

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

10 CFR 50.4

Subject: Watts Bar Nuclear Plant (WBN) Unit 2 - Revision of Commitment - Safety Evaluation Input Regarding Quality Assurance Records - Corrective Action Program (TAC Nos. ME2168 and MD9424)

The purpose of this letter is to clarify the Watts Bar Nuclear Plant (WBN) Unit 2 program commitment for the Corrective Action Program (CAP)-Quality Assurance (QA) Records (i.e., QA Records - CAP Commitment 133/Supplemental Safety Evaluation Report (SSER) CAP [13]/Nuclear Regulatory Commission (NRC) Inspection Planning & Scheduling [IP&S] # 014).

The program commitment implementation and assessment of WBN Unit 2 QA Records has evolved since the initial commitment was made by the Tennessee Valley Authority (TVA). TVA had committed to follow the approach utilized for the WBN Unit 1 CAP Plan for QA Records (Reference 1).

Reference 2 provided a description of the TVA CAP-QA Records plan assessment based on the WBN Unit 1 approach, the plan assessment results, and a request by TVA to close CAP commitment 133. Following the NRC's evaluation of Reference 2, clarification was requested of the TVA assessment and results. The NRC issued Supplement 21 (Reference 4) to the SSER identifying the CAP-QA Records item as CAP Number 13, QA Records with a status of "Open (NRR)." The NRC designated the status of CAP Number 13 as "Open (NRR)" (Reference 3).

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In response to the NRC request, TVA provided clarification and subsequent additional information regarding the WBN Unit 2 CAP-QA Records plan (References 3, 5 and 6). TVA provided a detailed discussion of the specific activities and identification of the CAPs/Special Programs/Other Programs that would be included in the assessment plan in order to address the NRC request. TVA planned to statistically sample WBN Unit 2 QA records by type to ensure retrievability, storage integrity, and completeness including identification of WBN Unit 2 QA record issues, and subsequent issue correction in a timely manner. TVA also stated that they would utilize a smaller initial sample size for WBN Unit 2 than had been used for the WBN Unit 1 Additional Systematic Records Review sample.

The NRC concluded that there was reasonable assurance that the proposed WBN Unit 2 CAP-QA Records plan would be appropriate and would support resolution of CAP Number 13 (Reference 7). Subsequently, the NRC issued Supplement 22 of the SSER and updated the status of CAP Number 13, "Quality Assurance (QA) Records," as "Resolved" (Reference 8). The "Resolved" designation was based on Reference 7.

TVA completed the WBN Unit 2 historical record assessments and evaluated the associated statistical sampling in accordance with NUREG-1475, "Applying Statistics." TVA determined with reasonable assurance that WBN Unit 2 records are similar to WBN Unit 1 records. WBN Unit 2 records were successfully retrieved, their storage location confirmed, evaluated for proper storage condition, and evaluated for completeness and accuracy.

Based on the acceptable assessment of the historical records utilizing the "95/95 Criterion Sampling Plan" from NUREG-1475, Plan C, it is TVA's plan to discontinue the process of sampling WBN Unit 2 records. Instead, TVA will continue to implement the current WBN Unit 2 completion process procedural controls. TVA considers this approach to be more robust and rigorous than the previous statistical sampling process. TVA further believes that utilization of procedural controls will provide the intended results of complete, accurate, properly stored, and retrievable QA records.

Assurance that the WBN Unit 2 QA records are complete and accurate is controlled through the WBN Unit 2 Completion Project processes, specifically, TVA procedures SMP-4.0, "Watts Bar Nuclear Plant Unit 2 System Completion and Turnover," and 0-TI-437, "System Turnover - Startup to Operations." Following the licensing of WBN Unit 2, all WBN Unit 2 records will be controlled by TVA procedure Nuclear Power Group (NPG) Standard Programs and Processes (SPP) NPG-SPP-31.2, "Records Management."

Various NRC inspections evaluated the QA Records CAP during the period of April 1, 2010, through September 28, 2013. No QA Records CAP-related findings were identified in the inspection reports (Reference 9).

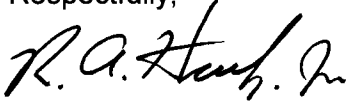
TVA believes that the proposed clarification to the WBN Unit 2 program commitment for the CAP-QA Records, that is, the discontinuation of the WBN Unit 2 records sampling plan and the implementation of WBN Unit 2 Completion Project processes, is appropriate.

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There are no new regulatory commitments associated with this submittal. If you have any questions, please contact me at (423) 365-1260 or Gordon Arent at (423) 365-2004.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 20th day of February, 2014.

Respectfully,

A handwritten signature in black ink, appearing to read "R. A. Hruby, Jr.", written in a cursive style.

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

cc: See Page 5

- References:
1. TVA letter to NRC dated January 29, 2008, "Watts Bar Nuclear Plant (WBN) - Unit 2 - Regulatory Framework for the Completion of Construction and Licensing Activities for Unit 2" (ADAMS Accession No. ML080320443)
 2. TVA letter to NRC dated September 26, 2008, "Watts Bar Nuclear Plant (WBN) - Unit 2 - Regulatory Framework for the Completion of Construction and Licensing Activities for Unit 2 - Corrective Action and Special Programs, and Unresolved Safety Issues" (ADAMS Accession No. ML082750019)
 3. NRC letter to TVA dated February 11, 2009, "Watts Bar Nuclear Plant, Unit 2 - Status of Regulatory Framework for the Completion of Corrective Action and Special Programs and Unresolved Safety Issues (TAC No. MD9424)" (ADAMS Accession No. ML090210107)
 4. NRC Safety Evaluation Report (SER), NUREG-0847, Supplement 21, issued February 2009, "Related to the Operation of Watts Bar Nuclear Plant, Unit 2" (ADAMS Accession No. ML090570741)
 5. TVA letter to NRC dated April 6, 2009, "Watts Bar Nuclear Plant (WBN) - Unit 2 - Additional Information Regarding WBN Unit 2 Corrective Action Programs (TAC No. MD9182)" (ADAMS Accession No. ML091120183)
 6. TVA letter to NRC dated July 10, 2009, "Watts Bar Nuclear Plant (WBN) - Unit 2 - Additional Information Regarding WBN Unit 2 Corrective Action Programs (TAC No. MD9424)" (ADAMS Accession No. ML091960112)
 7. NRC letter to TVA dated September 8, 2009, "Watts Bar Nuclear Plant, Unit 2 - Safety Evaluation Input Regarding Quality Assurance Records Corrective Action Program (TAC No. ME2168)" (ADAMS Accession No. ML092320707)
 8. NRC Safety Evaluation Report (SER), NUREG-0847, Supplement 22, issued February 2011, "Related to the Operation of Watts Bar Nuclear Plant, Unit 2" (ADAMS Accession No. ML110390197)
 9. NRC Inspection Reports: 05000391/2010603, dated August 5, 2010 (ADAMS Accession No. ML102170465); 05000391/2010604, dated October 29, 2010 (ADAMS Accession No. ML103060240); 05000391/2011602, dated March 18, 2011 (ADAMS Accession No. ML110800483); 05000391/2011608, dated November 4, 2011 (ADAMS Accession No. ML11311A082); 05000391/2011610, dated February 3, 2012 (ADAMS Accession No. ML12034A202); and 05000391/2013608, dated November 8, 2013 (ADAMS Accession No. ML13316A776)

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