



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 4, 2014

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

SUBJECT: WATTS BAR NUCLEAR PLANT, UNIT 2 - PLAN FOR THE ONSITE AUDIT
REGARDING TENNESSEE VALLEY AUTHORITY'S LICENSING
PRESERVATION PROGRAM

Dear Mr. Shea:

As part of the Watts Bar Nuclear Plant (WBN), Unit 2 operating licensing review reactivation, and consistent with the Commission's staff requirements dated July 25, 2007 (Agencywide Documents Accession Management System (ADAMS) Accession No. ML072060688; SECY-07-0096), the U.S. Nuclear Regulatory Commission (NRC) staff required the Tennessee Valley Authority (TVA) to develop and implement a licensing basis preservation program to confirm the validity of previously completed NRC safety evaluations to the final WBN Unit 2 design, or to identify topics that require supplemental review.

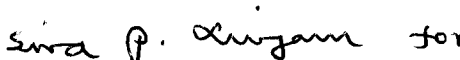
In Supplement 22 of NUREG-0847, "Safety Evaluation Report Related to the Operation of Watts Bar Nuclear Plant (WBN), Unit 2," the NRC staff documented the results of their review of TVA's Program for Maintenance and Preservation of the Licensing Basis for Units 1 and 2 (Section 25.9). After reviewing TVA's program for licensing preservation, the staff concluded that the program, if properly implemented, provides reasonable assurance that any effects on previously reviewed and resolved safety evaluation report topics will be evaluated for WBN Unit 2. An open item was created to track an NRC audit of TVA's Licensing Preservation Program; Open Item 12 in Appendix HH of Safety Evaluation Report, Supplement. The staff plans to conduct an onsite audit, which will address Open Item 12 in Appendix HH, in accordance with the enclosed audit plan from August 12-14, 2014.

J. Shea

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If you have any questions, please contact me at 301-415-2048 or by e-mail at Justin.Poole@nrc.gov.

Sincerely,


Justin C. Poole, Senior Project Manager
Watts Bar Special Projects Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No.: 50-391

Enclosure:
Audit plan

cc w/encl: Distribution via Listserv

Audit Plan
Watts Bar Nuclear Plant, Unit 2

BACKGROUND AND AUDIT BASIS

As part of the Watts Bar Nuclear Plant (WBN), Unit 2 operating licensing review reactivation, and consistent with the Commission's staff requirements dated July 25, 2007 (Agencywide Documents Accession Management System (ADAMS) Accession No. ML072060688; SECY-07-0096), the U.S. Nuclear Regulatory Commission (NRC) staff required the Tennessee Valley Authority (TVA) to develop and implement a licensing basis preservation program to confirm the validity of previously completed NRC safety evaluations to the final WBN Unit 2 design, or to identify topics that require supplemental review.

In 2008, the TVA submitted its licensing basis preservation program, New Generation Development and Construction (NGDC) Procedure PP-20, "Unit 2 Licensing Basis Preservation Program," which describes the methods or processes for determining potential changes that could affect Unit 2 licensing basis during the ongoing design and construction activities (ADAMS No. ML083460177). In April 2009 the NRC staff reviewed TVA's submittal and asked for more information and details about the licensing basis preservation program. In 2009, TVA provided Revision 002 of "Engineering Document Construction Release" (EDCR), which addressed how each Unit 2 design change would be evaluated for licensing-basis impact. Specifically, Attachment J of the EDCR, "Licensing Basis Preservation Review Form," has screening questions to identify potential impact. TVA identified the reviews to be performed for each EDCR issue to ensure that the Unit 2 licensing basis is implemented in the same manner as the corresponding Unit 1 licensing basis to obtain the same conclusion, to the maximum extent practical, as identified in NGDC PP-20. TVA stated that the process in Appendix J addresses the corrective action program plans, special programs, generic communications, exemptions, reliefs, and other actions identified in NGDC PP-20.

In Supplement 22 of NUREG-0847, "Safety Evaluation Report Related to the Operation of Watts Bar Nuclear Plant (WBN), Unit 2," the NRC staff documented the results of their review of TVA's Program for Maintenance and Preservation of the Licensing Basis for Units 1 and 2 (Section 25.9). After reviewing NGDC PP-20 and EDCR Appendix J the staff concluded that the program, if properly implemented, provides reasonable assurance that any effects on previously reviewed and resolved safety evaluation report topics will be evaluated for WBN Unit 2. NRC audits of TVA's implementation of NGDC PP-20 and EDCR Appendix J is documented as Open Item 12 (Appendix HH of Safety Evaluation Report, Supplement (SSER)).

In 2009, NRC inspectors identified areas where past Title 10, *Code of Federal Regulations*, Section 50.59 evaluations and screenings based their conclusions upon the unfinished state of Unit 2's facilities. The inspection report (IR) 05000390/2009002 and 05000391/2009002 confirmed that there are fractional percentages of previous screenings and evaluations that will need to be revisited under the construction interface procedures tied to licensing basis preservation and initiated tracking Problem Evaluation Report (PER) 162088 to ensure that there is a clear reference to this activity within their corrective action program (ADAMS ML091140240).

Enclosure

By letter dated June 17, 2011, TVA transmitted an enclosure documenting a self-assessment of its Licensing Basis Preservation Program (ADAMS ML11186A552). The June 17, 2011, letter documented TVA's commitment to perform a periodic review of licensing written correction action plans (CAP) and perform a focused self-assessment to ensure that the CAP specified in PER 239111 is implemented effectively.

AUDIT SCOPE

As discussed, onsite audits will be performed per Office Instruction LIC-111, "Regulatory Audits," to support the NRC staff's safety review of TVA's Licensing Preservation Program as described in Open Item 12 documented in SSER Appendix HH. The purpose of the audit is to obtain and review information regarding how TVA implements its Licensing Preservation Program (NGDC PP-20), including how it has utilized the process from EDCR Appendix J.

The onsite audit will have three components: (1) a review of a list of EDCR Attachment J evaluation forms; (2) selection of a sample of Attachment J evaluation forms covering a variety of technical areas and (3) a detailed review of those evaluation forms where section 4, 5, 6 are answered affirmatively.

INFORMATION NEEDS

- Current version of NGDC PP-20, "Licensing Basis Preservation Program."
- Documents related to the current version of EDCR including Appendix J Evaluation Forms.
 - If available, a list of EDCR Attachment J evaluation forms including a descriptive title for each item on the list
 - If available, items screening in for section 4, 5, or 6 in Attachment J.
- Documentation of TVA's regulatory commitments related to the Licensing Basis self-assessments (tracked via PER 239111).
- Construction interface procedures tied to licensing basis preservation and tracked via PER 162088.
- Documents related to TVA Quality Assurance Program Nuclear Quality Assurance Plan (NQAP) Appendix F, Watts Bar Unit 2 Construction Completion Project.

NRC AUDIT TEAM

Title	Team Member
Team Lead	Justin Poole
Project Manager	Jeanne Dion
Project Manager	Anthony Minarik

LOGISTICS

The audit will be conducted onsite at Watts Bar August 12-14, 2014. Entrance and exit briefings will be held with the licensee at the beginning and end of the audit, respectively, as well as daily briefings of team activities. Additional details will be addressed over the phone. A more detailed schedule is provided on the following page.

A private conference room is requested for NRC audit team use with access to audit documentation upon arrival and as needed.

DELIVERABLES

An audit report/summary will be issued to the licensee within 45 days from the end of the audit.

Proposed Schedule

Onsite Day 1, Tuesday August 12, 2014

8:00 am	Check in at site; Badging
9:00 am	Entrance meeting
9:30 am	NRC Audit Team Activities commence
12:00 pm	Lunch
1:00 pm	Audit Team meeting
4:30 pm	Team lead daily debrief with licensee

Onsite Day 2, Wednesday, August 13, 2014

8:00 am	Check in at site; meet with Senior Resident/Resident
9:00 am	Plant tour
12:00 pm	Lunch
1:00 pm	Continue NRC Audit Team Activities
3:30 pm	Audit Team meeting
4:30 pm	NRC/Licensee exit meeting

Onsite Day 3, Thursday, August 14, 2014

8:00 am	Check in at site; meet with Senior Resident/Resident
9:00 am	Continue NRC Audit Team Activities
12:00 pm	Lunch
1:00 pm	NRC/Licensee exit meeting
2:00 pm	Tentative Schedule Meetings with TVA licensing
4:30 pm	Exit Site

J. Shea

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If you have any questions, please contact me at 301-415-2048 or by e-mail at Justin.Poole@nrc.gov.

Sincerely,

/RA by SLingam for/

Justin C. Poole, Senior Project Manager
Watts Bar Special Projects Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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Enclosure:
Audit plan

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ADAMS Accession No. ML14205A700

OFFICE	NRR/DORL/PMit	NRR/DORL/LPWB/PM	NRR/DORL/LPWB/LA	NRR/DORL/LPWB/BC
NAME	JDion	JPoole	BClayton	JQuichocho
DATE	7/30/14	7/30/14	8/1/14	8/4/14
OFFICE	NRR/DORL/LPWB/PM			
NAME	JPoole (SLingam for)			
DATE	8/4/14			

OFFICIAL AGENCY RECORD