



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

Report Nos.: 50-259/85-47, 50-260/85-47, 50-296/85-47, 50-327/85-33 and
 50-328/85-33

Licensee: Tennessee Valley Authority
 500A Chestnut Street
 Chattanooga, TN 37401

Docket Nos.: 50-259, 50-260, 50-296
 50-327, and 50-328

License Nos.: DPR-33, DPR-52,
 DPR-68, DPR-77 and
 DPR-79

Facility Names: Browns Ferry 1, 2, and 3 and Sequoyah 1 and 2

Inspection Conducted: October 7-11, 1985

Inspector: *J. H. Jackson for*
 C. Smith

10-31-85
 Date Signed

J. H. Jackson for
 R. Moore

10-31-85
 Date Signed

Approved by: *J. H. Jackson for*
 G. A. Belisle, Acting Section Chief
 Division of Reactor Safety

10-31-85
 Date Signed

SUMMARY

Scope: This routine, unannounced inspection entailed 72 inspector-hours at the Central Office in Chattanooga, Tennessee, in the areas of offsite support staff and offsite review committee.

Results: No violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- R. Alsup, Supervisor, Licensing Projects
- J. Cain, Supervisor, Purchasing
- G. Cox, Quality Assurance (QA) Evaluator
- D. Dodson, Group Head, Nuclear Generating Equipment Group
- B. Eiford, Health Physics, Radiological Assessment Review Committee (RARC) Secretary
- C. Guhme, Supervisor, Power Test Unit/Plant Systems Operation (PSO)
- *D. Henry, Purchasing QA Engineer
- *J. Hood, Materials Manager
- *J. Hulton, Director Nuclear Services
- C. Kent, Chief of Policy and Technical Assistance, Health Physics
- *G. Killian, Branch Chief, Quality Audit Branch
- *E. Kvaven, Purchasing Assistant Director
- *C. Mills, Electrical Engineer, QA
- *H. Mitchell, PSO
- *R. Mullins, Director, QA
- R. Nicoll, Health Physics
- *D. Nowading, Materials Information Support Branch Chief
- *W. Poling, Power and Engineering (P&E) Staff
- *B. Roberts, Nuclear Safety Staff (NSS) Executive Secretary
- P. Smith, Head, Programs Applications Group
- J. Stamey, Health Physics
- *F. Szczepanski, Chief, NSS
- B. Weeks, Assistant Branch Chief, Power Stores
- J. Wills, Sequoyah Licensing

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on October 11, 1985, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Offsite Support Staff (40703)

References: (a) 10 CFR 50.54(a)(1), Conditions of Licenses



- (b) TVA-TR75-1A, Quality Assurance Program Description For the Design, Construction, and Operation of TVA Nuclear Power Plants, Revision 8
- (c) 10 CFR 50 Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
- (d) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation)
- (e) ANSI N18.7-1976, Quality Assurance for the Operational Phase of Nuclear Power Plants
- (f) Regulatory Guide 1.146, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants
- (g) ANSI N45.2.23-1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants
- (h) Technical Specifications, Section 6, Administrative Controls

The inspectors visited the corporate office to determine whether the offsite support staff functions were performed by qualified personnel in accordance with licensee approved administrative controls, regulatory requirements, and industry guides and standards. The following criteria were used during this review to assess the adequacy of the offsite staff:

- Administrative controls were established to assign departmental responsibilities, authorities, and lines of communication in conformance with the requirements of 10 CFR 50 Appendix B, and the licensee's approved QA program.
- Managers, group leaders, and staff members were cognizant of their responsibilities and authorities.
- The above personnel were qualified for the related work.
- Quality assurance audits of offsite support staff activities were conducted satisfactorily and corrective actions for identified deficiencies were completed in a timely manner.

The documents listed below were reviewed to determine if these criteria had been incorporated into the program for providing support to licensed facilities by the offsite support staff:

TVA Topical Report, TVA-TR75-1A Section 17.0, TVA Organization's Participating in the Quality Assurance Program, Revision 8

NQAM, Part I, Section 1.3, QA Program Requirements - NRC Regulated Programs which are Conditions of the Operating License, dated December 31, 1984

NQAM, Part IV, Services

Section 6.0, PSO Activities in Support of Design, Construction and Operation's of TVA's Nuclear Plants

Section 7.0, Purchasing

Section 8.0, Procurement

Section 9.0, Packaging, Shipping, Receiving, Storage and Handling

Section 10.0, Offsite Environmental Radiological Monitoring and Health Physics Support Activities

The Topical Report, Section 17.0, describes the functions of the principal TVA organizations participating in the nuclear QA program. The Nuclear Quality Assurance Manual (NQAM) is the implementing document of the Topical Report and defines the QA program requirements for activities performed by various offsite support groups. Each support organization is required to have a QA program documented by written policies, procedures, and instructions which control activities defined in the NQAM. In addition, each offsite support group's organizational structure, functional responsibilities, levels of authority, and lines of internal and external interface are required to be documented in writing.

Pursuant to the requirements delineated in the NQAM, the inspector conducted interviews with licensee personnel from the following offsite support groups to ascertain the degree of conformance with QA program requirements:

Division of Nuclear Services

Division of Purchasing

Division of Operations Support Materials

Division of Power Systems' Operations (PSO)

Radiological Health Staff

Quality Systems Branch

The inspector determined during the course of these interviews that the licensee was in the process of reorganizing its organization structure. The inspector was advised that TVA made a presentation to the Advisory Committee on Reactor Safeguards (ACRS) on October 10, 1985, to address this reorganization. Organization charts contained in the package presented to the ACRS were reviewed by the inspector, who discussed the effects of these

changes with licensee personnel. For the most part, licensee staff members were uncertain as to the final organizational structure that will be established. They were also uncertain as to the effect of changes on the support to the licensed facilities provided by the offsite support staff. The inspector was told by licensee personnel that because of the early stage of TVA's reorganizational effort, definitive information had not yet been provided to the staff by senior management.

To further clarify the issue of organizational structures, functional responsibilities, levels of authority, and lines of internal and external interfaces of the offsite support staff, the inspector discussed anticipated QA program changes with the Quality System Branch Manager. The inspector was informed that TVA envisages changes to the QA program which would result in each licensed facility Site Director having total control of the QA program that would be applicable to his facility. Additionally, the Site Director will be given the responsibility and authority to act as the ultimate owner-operator for his facility.

The inspector determined that effects of this change in policy from the Office of Nuclear Power having responsibility and authority to act as the ultimate owner-operator for TVA's nuclear plants would be as follows:

Revising the Topical Report to delineate the QA program changes applicable to each facility.

Revising the Nuclear Quality Assurance Manual (NQAM) to implement the commitments contained in the Topical Report.

Revising each offsite support group's QA program documents to implement the QA program requirements delineated in the NQAM for each licensed facility.

Either revising or adding to plant site QA program documents in order to implement QA program changes of the Site Director assuming the authority and responsibility as the ultimate owner-operator of the licensed facility.

Revising the licensing documents of each facility to reflect the above change in owner-operator status.

Because each licensed facility will be treated as an individual nuclear utility, it is anticipated that there will be an increase in program documents equal to the number of operating sites for all offsite support groups. Licensee personnel were unable to state the degree of uniformity that will exist in QA programs that will be applicable to each site. These programs will now be described in individual QA program descriptions intended for each facility.

Licensee management anticipates further reductions in staffing at the Central Office with transfer of resources to the operating sites. The Office of Nuclear Power will be abolished, and a new management position,

"Manager of Nuclear Operations", will be established. Written descriptions of the new organizational structure, functional responsibilities, levels of authority, and interfaces were not available for review by the inspector.

The inspector discussed the Procurement Task Force Report, dated August 1984, with licensee management. This report identified major problems within the Nuclear Power procurement process and provided recommended solutions for the problems identified. The inspector was presented with an unofficial copy of this report at the exit interview.

Extensive interviews with licensee personnel from the Division of Purchasing and the Division of Operations Support - Materials were conducted to assess the status of activities conducted by both groups. The inspector determined that reorganization of the Division of Purchasing occurred on May 13, 1985. Activities of this group are controlled by the Division of Purchasing QA manual which defines the procurement functions of the purchasing division in connection with nuclear safety-related structures, systems, and components. The inspector identified to licensee management what he perceived as a program weakness. This weakness involved the absence of description for the organizational structures functional responsibilities, levels of authority, and internal and external interfaces of the various procurement branches within the Division of Purchasing. The QA manual, which delineates the program controls applicable to the Division of Purchasing, will of necessity have to be revised to be consistent with the reorganization of the Division of Purchasing.

The inspector determined that for the Division of Operations Support - Materials, a documented QA program had been prepared to control the activities of the Materials Information Systems Branch. Based on discussions with licensee personnel and a review of the program manual, the QA program requirements in this area appeared to be adequately defined.

The Power Stores Branch, Nuclear Operations Section, provided offsite support to the licensed facilities in various areas such as training in receipt-inspection. The interface of this section with the plant site in support of plant operations had not yet been defined. A job description had been prepared to describe the duties of the individual who presently occupies this position. However, based on discussions with licensee management, some confusion existed as to the specific functional responsibilities of this section. The inspector identified to licensee management the need to put in writing the responsibilities of this section, and the method by which interfaces with plant sites will be conducted.

The inspector reviewed the following audits of selected offsite support staff activities, and verified that appropriate corrective actions were initiated for identified deficiencies.

Audit Report Number: CH-8400-15, Title: Radiological Environmental Monitoring and Radiological Assessment and Review Committee (RARC), Date Audit Conducted: September 24 through October 19, 1984

Audit Report Number: QSS-A-85-007, Title: Quality Assurance Program and Organization, Date Audit Conducted: January 21 through February 11, 1985

Audit Report Number: CH-8400-04, Title: Quality Assurance Program (PSO), Date Audit Conducted: November 14-22, 1983

Because of changes occurring in TVA's organization and the new philosophy of the Site Director assuming the authority and responsibilities to act as the ultimate owner-operator for his facility, an assessment of the offsite support staff could not be made. A reinspection of this area will be required upon termination of this transitional phase.

Within this area no violations or deviations were identified.

5. Offsite Review Committee (40701)

- References:
- (a) 10 CFR 50.54(a)(1), Conditions of Licenses
 - (b) TVA-TR75-1A, Quality Assurance Program Description for the Design, Construction, and Operation of TVA Nuclear Power Plants, Revision 8
 - (c) Browns Ferry Technical Specifications, Section 6.0, Administrative Controls
 - (d) Sequoyah Technical Specifications, Section 6.0, Administrative Controls
 - (e) Regulatory Guide 1.33, Quality Assurance Program Requirements, (Operation)
 - (f) ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

The inspector reviewed the licensee offsite review committee program required by references (a) through (f) to determine whether the program had been established in accordance with regulatory requirements, industry guides and standards, and Technical Specifications. The following criteria were used during this review to assess the overall acceptability of the established program:

- Charter or procedures governing review group activities were consistent with Technical Specifications and other regulatory requirements.
- Review group membership and qualifications were as required by Technical Specifications and other regulatory requirements.
- Review group meetings met quorum and expertise requirements of Technical Specifications and regulatory guides.

- Activities required by Technical Specifications were reviewed by the group.

The documents listed below were reviewed to determine if these criteria had been incorporated into the offsite review program:

Nuclear Safety Review Program Manual, Revision 10

Nuclear Safety Review Procedure (NSRP) 3.1, Conduct of Nuclear Safety Review Board (NSRB) Reviews, Revision 1

NSRP 4.2, Defect and Noncompliance Evaluation Required by 10 CFR 21, Revision 2

Browns Ferry NSRB meeting minutes for meetings 209, 210, 211, 212, conducted in 1985

Sequoyah NSRB meeting minutes for meetings 69 and 70, conducted in 1984

Sequoyah NSRB meeting minutes for meetings 71 through 76, conducted in 1985

TVA Radiological Assessment Review Committee (RARC) Charter, September 5, 1984

Browns Ferry RARC minutes for meetings of February 28, 1985, August 21, 1984, and September 25, 1985

Sequoyah RARC minutes for meetings of February 19, 1985, August 21, 1984, and September 25, 1985

The licensee utilized two offsite review groups for each site. The Nuclear Safety Review Board (NSRB) addresses activities associated with nuclear safety and regulatory issues. The RARC addresses radiological and health physics activities. The inspector interviewed the chairman, executive secretary, and various members of each group to determine each member's knowledge of his responsibilities. Additionally, the inspector reviewed each member's qualifications to ensure conformance with the assigned responsibilities.

Items reviewed by the NSRB are tracked via a computer documentation system maintained by the executive secretary. Issues reviewed are adequately documented to determine status of the review effort.

The NSRB was approved by Technical Specifications as a standing committee whose members are provided by various corporate departments. This is in accordance with licensee commitments delineated in ANSI 18.7-1976, paragraph 4.3.2. The licensee had started the process of establishing a full time review group, the Nuclear Safety Staff (NSS), and this change to the QA program has been approved in the Topical Report. The change to Technical Specifications, however, has not been approved, although submitted

concurrently with the Topical Report change. Pending approval of this Technical Specification change, a discrepancy exists between these documents regarding the description of the NSS. This discrepancy does not impair the function of the NSRB as described in Technical Specifications. The NSRB will continue to perform review functions until the Technical Specification change is approved at which time the full-time NSS will assume this responsibility.

Within this area, no violations or deviations were identified.

