

7741  
27492

Summary of Interview

Donald J. Skovholt  
September 27, 1979

Mr. Skovholt was scheduled for a deposition on this date, but since the court reporter failed to be present, he was interviewed by W. Parler and W. Lanning. The following list summarizes some of the important highlights of the interview concerning quality assurance, technical qualifications, and preoperational and startup test programs.

1. Mr. Skovholt did not recall any efforts by the NRC to go back and review all licensee QA programs pursuant to the recommendations of the Browns Ferry Task Force.
2. Licensee may change implementing procedures and Q-list without approval of NRC. Only Regulation governing changes to approved QA programs is 10 CFR 50.59.
3. Prior to 1979, the review and approval of Q-list was based on judgment of QA reviewer. He essentially compared Q-list to prior Q-list for similar plants.
4. No attempt has been made to establish which parts of the system identified on the Q-list is actually safety related. The licensee makes this determination.
5. Although Criterion 1 of Appendix A to Part 50 requires "structures, systems and components important to safety shall be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions to be performed," the NRC staff has never reviewed or established acceptance criterion for such standards.
6. NRC staff lacks definition or position with respect to the meaning and implementation of QA requirements for "systems important to safety" (Appendix A) or "systems which perform a safety related function" (Appendix B).
7. One of the major obstacles to publishing a regulatory guide on how to implement Appendix B appears to be list of safety-related equipment. Guide has been in draft form resulting from QA task force since 1975.
8. Office of Standards Development has recently initiated a rule change to reconcile differences between Criterion 1 of Appendix A and Appendix B.

9. Appears to be lack of definitive guidance concerning interface between operations (surveillance testing) and QA programmatic requirements.
10. NRC does not review quality control to assure that QA is being properly implemented.
11. No qualification requirements are imposed on personnel who perform surveillance testing, inspection, maintenance, repairs, or modifications.
12. QA has not received upper management vocal support since L. Manning Muntzing. Mr. Skovholt said improvement needed in this area.
13. Noted QA deficiencies at TMI-2:
  - a. Block valves closed in AFW system
  - b. Improper use of tags on control panel
14. LERs and NPRDS reports are reviewed by QAB. NPRDS reports come infrequently. Mr. Skovholt has not seen anything useful in NPRDS.
15. QA requirements have not been uniformly backfitted. Reviewers normally solicit cooperative efforts - not always successful.
16. Regarding changes to QA programmatic requirements:
  - a. Better definition of equipment subjected to specific QA programs (Graded QA program)
  - b. Better assurance that QA programs are implemented properly. Resident inspectors should enhance implementation.
  - c. Increase number of QA/QC personnel at site to increase effectiveness of QC.
17. Although QAB provides SER input in Chapter 13 regarding technical qualifications of applicant, the licensing project manager makes the basic finding or conclusion in Chapter 22 of the SER that the applicant is technically qualified.
18. Mr. Skovholt said that there had been formal guidance given to LPMs concerning the evaluation of technical qualifications.
19. QAB does not review the procedures for Preoperational and Startup test programs. Reviews description of programs and may consult with other reviewers.

20. QAB or the AD does not concur in Operating License. Did not know whether the list of tests outstanding in TMI-2 license was excessive. Preoperational tests should be completed prior to fuel loading. Apparently Pre-op and Startup tests all lumped together in TMI-2 license.
21. Wrote an information paper to the Commission responding to Sandia's report and recommendations on QA program.
22. Apparently proof testing and qualification testing do not receive NRC attention that preop, startup and surveillance testing receive.
23. He was not aware of any changes, including human performance, which resulted in NRC QA requirements as a result of WASH-1400.
24. During the Muntzing era, licensee's vendors were encouraged to submit topical report of their QA program for NRC review. Subsequently, they were not accepted since they did not meet criteria for topical report program.
25. NRC still needs requirement to maintain FSAR up to date.
26. DOR refers most QA changes to QAB for review. DOR has two QA reviewers.
27. Mr. Skovholt said QA program should be part of license. Proposal turned down for years by his management.
28. Does not review software for simulator training.
29. No existing NRC requirements for qualification of instructors for operators.
30. Training of operators already gets a very thorough review by the staff. Reviews and approves training program plan.
31. Improvements in operator training continuously under discussion. Recognized that training program required broadening.