

JUL 31 1981

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Mr. L. M. Mills, Manager
Nuclear Regulation and Safety
Tennessee Valley Authority
400 Chestnut Street Tower II
Chattanooga, TN 37401

Dear Mr. Mills:

SUBJECT: PROPOSED REVISION 5 TO TVA-TR75-1A

Your letter of May 28, 1981 responded to our questions of April 14, 1981 regarding proposed Revision 5 to TVA's Topical Report, TVA-TR75-1A, "Quality Assurance Program Description for Design, Construction, and Operation of TVA Nuclear Power Plants." Several items of your May 28, 1981 response require clarification as noted in the enclosure to this letter.

Your response to the enclosure should be submitted directly to me. Please contact Jack Spraul of my staff on FTS 492-7741 if you have any questions.

Sincerely,

Original signed by
Walter P. Haass

Walter P. Haass, Chief
Quality Assurance Branch
Division of Engineering

Enclosure:
Request for Additional
Information



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PDR TOPRP EUTTVA
C PDR

OFFICE	DE:QAB	DE:QAB			
SURNAME	JSpraul:cg	WPaass			
DATE	7/31/81	7/31/81			

REQUEST FOR ADDITIONAL INFORMATION

TVA-TR75-1A, Rev. 5 (Section 17.1)

33. Incorporate the following commitments or clarifications into the text of TVA-TR75-1, Rev. 5:
- a) The reply to item 4 which states that OEDC QA will review and approve all construction QC procedures and the engineering procedures of EN DES as selected by the OEDC QA Manager.
 - b) The reply to item 7 which states that there are regular meetings of the OEDC QA Manager with the EN DES and Construction QA Branch Chiefs. Also indicate the periodicity of these meetings.
 - c) The reply to item 9 which clarifies the specific meaning of "selected" in two places.
 - d) The reply to item 12 that indicates that TVA inspectors at suppliers can initiate stopwork through the Central Quality Control Staff, the responsible procurement engineer, and the TVA contracting officer.
34. The reply to "Question 4 Deleted Item No. 13" refers to item 1 of the proposed revision. Item 1 of the proposed revision addresses "quality and regulatory requirements," but it does not address generic problems and construction experience at other facilities. The deletion of the commitment that the QA Manager provides guidance on QA matters relative to generic problems and construction experiences at other facilities is unacceptable. Reinstate the commitment, provide acceptable justification for its deletion, or provide an alternative for our evaluation.
35. Describe the relationship(s) between the OEDC QA Manager and the TVA QA Steering Committee. (See reply to "Question 4 Deleted Item No. 20.")
36. Provide some idea of the historical number and content of meetings between EN DES line organizations and EN DES QAB which replace the EN DES QA Program meetings. (See reply to "Question 4 Deleted Item No. 21.") That is, do they average one a week, one a month, or what? Also indicate the percentage of these meetings that EN DES QAB has requested attendance of OEDC QA.
37. The accepted version (Revision 4) of the topical report states:
- The Quality Control regional offices are responsible for determining that suppliers meet the requirements of procurement documents, for visiting suppliers' plants and performing quality control or surveillance activities as necessary to assure compliance, for determining that suppliers generate necessary records and maintain adequate files, for auditing the implementation of suppliers' QA Programs as a part of the EN DES Vendor Audit Program, for reporting results of quality control and surveillance activities to the central QC office staff, for identifying and reporting any nonconformances and stopping work where necessary until compliance is achieved, and for reviewing selected inspection and surveillance activities of NSSS vendor inspectors.

Correspondingly, the proposed Revision 5 states:

The regional offices are responsible for performing surveillance activities as necessary to assure that suppliers meet the requirements of procurement documents and for reporting results of surveillance activities to the central quality surveillance staff.

While TVA Reply No. 12 clarified the stopwork and surveillance activities and responsibilities of the regional offices, there still appears to be a reduction in the QA performed by the regional offices. Further clarification is required.

38. The reply to "Question 14 Deleted Item No. 4" does not make it clear that the EN DES Manager's staff meeting will "review the status and adequacy of the EN DES Quality Assurance Program, assure that quality assurance requirements are properly interpreted and followed, and review problems and determine methods for resolution." Provide such a commitment.
39. The reply to "Question 14 Deleted Item No. 6" states that there are no longer QC committees at the nuclear plant sites. While such committees are not required by the NRC, their elimination could be construed as a weakening of TVA's QA program. Justify the elimination of these committees.
40. TVA Reply No. 18 should include the fact that all site QA Engineering personnel report to the Supervisor, QA Unit.
41. Regarding TVA Reply No. 21, it is the staff position that NUC PR reviews either the construction test procedures to assure that the construction tests meet the preoperational test prerequisites or the construction test results to assure that the preoperational test prerequisites have been satisfied. Provide such a commitment (to one or the other) or propose an alternative for our evaluation.