



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

September 16, 1988

Docket Nos. 50-327/328

LICENSEE: Tennessee Valley Authority
FACILITIES: Sequoyah Nuclear Plants, Unit 1 and 2
SUBJECT: MINUTES OF THE SEPTEMBER 8, 1988 MEETING WITH THE
TENNESSEE VALLEY AUTHORITY (TVA) ON CHANGES TO THE
TVA CONDITIONS ADVERSE TO QUALITY PROGRAM AT SEQUOYAH

On Thursday, September 8, 1988, a meeting was held at the Office of Special Projects (OSP), NRC, headquarters in Rockville, Maryland with the Tennessee Valley Authority (TVA). The meeting was held to discuss changes to TVA's Conditions Adverse to Quality (CAQ) Program for Sequoyah. Enclosure 1 is the list of individuals attending the meeting. The following is a summary of the significant items discussed and the actions, if any, taken or proposed.

This meeting was requested by the staff to understand the changes to the CAQ program at Sequoyah and the impact of these changes on the staff's Order EA-85-49. This order was considered satisfied for Sequoyah for the restart of Sequoyah Unit 2 in the staff's Safety Evaluation dated March 31, 1988. The order concerned the effectiveness of the CAQ program at Sequoyah.

TVA began its presentation with the handouts in Enclosures 2 and 3. Enclosure 2 is the outline of TVA's presentation. Enclosure 3 provides the details. The agenda for the meeting is the second page of Enclosure 2.

TVA stated in the meeting that the changes described in Enclosures 2 and 3 do not affect Order EA 85-49. TVA explained that Enclosures 2 and 3 describe Revision 4 of the CAQ program. Revision 4 is not a fundamental change but an evolutionary one which comes from TVA's experience with the program for over a year and from staff inspections and Institute of Nuclear Power Operations (INPO) audits.

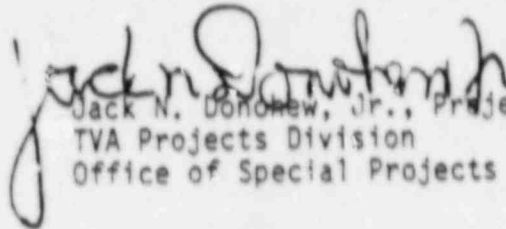
After the presentation by TVA, the staff held a closed meeting to discuss the changes to the CAQ program.

The staff concluded that it was in agreement with TVA that the changes to the CAQ program were evolutionary and did not affect the conclusions of the staff

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in its Safety Evaluation on Order EA 85-49. Implementation of the CAQ program at Sequoyah will be monitored by the staff through its normal inspection activities.


Jack N. Donohew, Jr., Project Manager
TVA Projects Division
Office of Special Projects

Enclosures:

1. Attendee List
2. Corrective Action Meeting,
September 8, 1988
3. Corrective Action Program
Enhancements

cc w/enclosures:
See next page

Mr. S. A. White

-3-

Sequoyah Nuclear Plant

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LIST OF ATTENDEES
FOR SEPTEMBER 8, 1988 MEETING ON CHANGES TO
TVA'S CAQ PROGRAM

<u>Name</u>	<u>Affiliation*</u>
J. Donohew	NRC/OSP
R. Pierson	NRC/OSP
D. Moran	NRC/OSP
K. Jenison	NRC/OSP
G. Hubbard	NRC/OSP
M. J. Ray	TVA
N. C. Kazanas	TVA
L. Martin	TVA
F. Roemer	TVA

*TVA = Tennessee Valley Authority
*NRC = Nuclear Regulatory Commission

CORRECTIVE ACTION MEETING
WITH NRC
SEPTEMBER 8, 1988

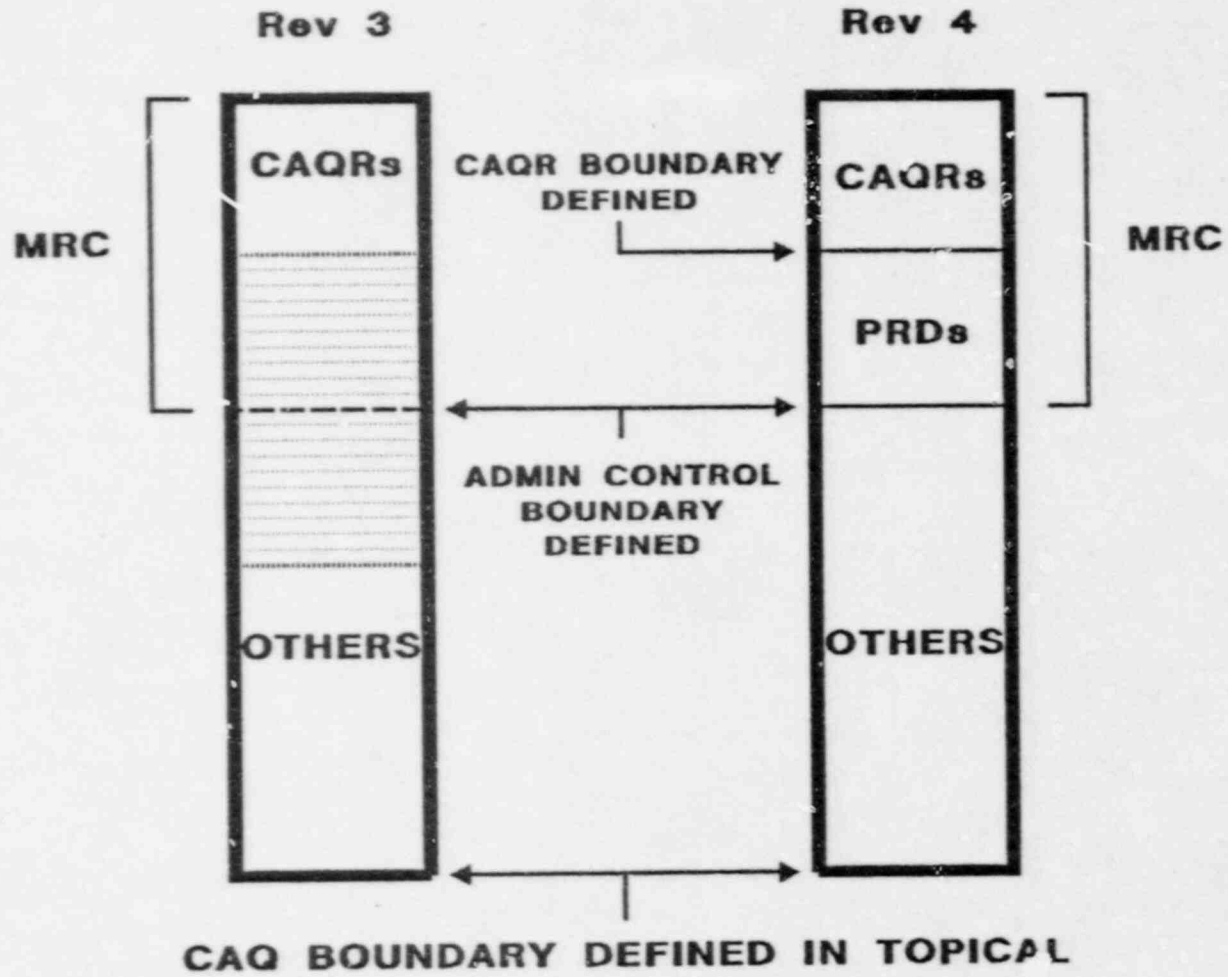
CORRECTIVE ACTION PROGRAM ENHANCEMENT

- Improved Control/Effectiveness
- Important Issues Emphasized
- Improved Accountability
- Balance of Plant
- Conclusions

IMPROVED CONTROL/EFFECTIVENESS

- Corrective Action Program Bounded
- Interim Corrective Action
- Corrective Action Plans
- Generic Reviews
- Documentation of Verification
- Form Improvements
- Term Definitions

CAQ PROGRAM BOUNDARIES



IMPORTANT ISSUES EMPHASIZED

- Efficient Resource Allocation
- Cause of Deficiencies
- Reportability
- Abnormal Events
- Operability

IMPROVED ACCOUNTABILITY

- Site Quality Determinations
- Invalidating CAQR's
- Timeliness
- Management Responsibilities Defined
- Management Awareness

BALANCE OF PLANT

- Problem Reporting Document
- QA Program Scope

CONCLUSIONS

- Training Established
- Commitments to EA-85-49 Satisfied
- Rev . 3 Is Working Well
- Rev . 4 Enhances Rev . 3

CORRECTIVE ACTION PROGRAM
ENHANCEMENTS

I. IMPROVED CONTROL/EFFECTIVENESS

A. CORRECTIVE ACTION PROGRAM BOUNDARY (SITE PROCEDURE AI-12)

- DEFINED WHICH ADMINISTRATIVE CONTROL PROGRAMS COULD BE UTILIZED TO CORRECT CAQS
- LIMITED NUMBER OF PROGRAMS
 - COTS SURVEILLANCE, QC INSPECTION, AUDIT
 - PRDS
 - WRS
 - TEST DEFICIENCIES
 - POTENTIAL REPORTABLE OCCURRENCES
 - DRAWING DISCREPANCIES
 - RADIOLOGICAL INCIDENT REPORTS
 - HOUSEKEEPING DEFICIENCIES

B. INTERIM CORRECTIVE ACTION (NQAM)

- REQUIRED WHEN REPETITION OF EVENT MAY OCCUR WHILE C/A IS BEING DEVELOPED AND APPROVED
- ADDRESSES
 - IMMEDIATE IMPACT ON HARDWARE
 - BREAKDOWN IN THE QA PROGRAM

C. CORRECTIVE ACTION PLANS (NQAM)

- ONSITE RESPONSIBLE ORGANIZATIONS
 - DEVELOP AND OBTAIN APPROVAL OF C/A IN 30 DAYS
 - IMMEDIATE ESCALATION IF LATE
- C/A REQUIRES COORDINATION WITH OFFSITE ORGANIZATIONS
 - DEVELOP AND OBTAIN APPROVALS OF C/A IN 60 DAYS
 - IMMEDIATE ESCALATION IF LATE
- CURRENT PROGRAM (REV. 3)
 - 30 DAYS TO DEVELOP
 - 30 DAYS TO APPROVE
 - ESCALATE 30 DAYS AFTER IT WAS LATE

D. GENERIC REVIEWS (NQAM)

- REQUIRES ESCALATION DUE TO LACK OF PROGRESS
- LATENESS IS DETERMINED BASED ON RECEIPT ONSITE BY CAQ COORDINATOR
- (SITE AI-12) REQUIRES ESCALATION AFTER CAQR ONSITE FOR GENERIC REVIEW 40 DAYS

E. DOCUMENTATION OF VERIFICATION (NQAM)

- SPECIFIES REVIEW PERFORMED TO VERIFY C/A AS COMPLETE SHALL BE DOCUMENTED
 - QA - INITIATED SIGNIFICANT HARDWARE
 - RO - ALL

F. FORM IMPROVEMENT (NQAM)

- TIGHTER CONTROL OF CAQR FORMS (TVA FORM NUMBERS)
- STREAMLINES PROCESSING
- ALLOWS USE OF CAQR FORM AS A DESIGN OUTPUT DOCUMENT FOR ACCEPT-AS-IS AND REPAIR DISPOSITIONS

G. TERM DEFINITIONS (NQAM)

- ADDED CLARITY AND PROVIDED DEFINITIONS
 - SIGNIFICANCE, ACCEPT-AS-IS, ADVERSE TRENDS, GENERIC SCRAP, ETC.
 - (SITE AI-12) CLOSURE CRITERIA

II. IMPORTANT ISSUES EMPHASIZED

A. EFFICIENT RESOURCE ALLOCATION (NQAM)

- IMPROVED CRITERIA FOR CAQR DETERMINATIONS
- EFFECTIVE UTILIZATION OF ADMINISTRATIVE PROGRAMS WHICH HAVE ABILITY TO EFFECTIVELY CORRECT CAQS FOR LOWER THRESHOLD ITEMS
- DIRECTS MANAGEMENT'S ATTENTION TO IMPORTANT ISSUES

B. CAUSE OF DEFICIENCIES (NQAM)

- ALL CAQRS RECEIVE AN APPARENT CAUSE DETERMINATION
- SIGNIFICANT CAQRS CONTINUE TO RECEIVE ROOT CAUSE DETERMINATION
- ROOT CAUSE DETERMINATION REQUIRED FOR CAQRS WHICH ARE POTENTIALLY GENERIC OR AFFECT OPERABILITY

C. REPORTABILITY (NQAM)

- RESPONSIBLE ORGANIZATIONS DETERMINE POTENTIAL REPORTABILITY
- GUIDANCE FOR DETERMINATION GIVEN AND DOCUMENTED

D. ABNORMAL EVENTS (NQAM)

- LIST OF ABNORMAL EVENTS PROVIDED
- DIRECTS IMMEDIATE MANAGEMENT INVOLVEMENT

E. OPERABILITY (SITE PROCEDURE)

- SITE PROCEDURE STRESSES SHIFT OPERATIONS SUPERVISOR MAKES FINAL DETERMINATION
- EMPHASIZES TIMELINESS OF INITIAL POTENTIAL OPERABILITY CALL

III. IMPROVED ACCOUNTABILITY

A. SITE QUALITY DETERMINATIONS (NQAM)

- HARDWARE CAQRS REVIEWED FOR NONCONFORMING MATERIAL TAG REQUIREMENTS
- ALL CAQRS REVIEWED FOR QA PROGRAM DEFICIENCY
- ALL CAQRS REVIEWED FOR STOP WORK ORDER REQUIREMENTS

B. INVALIDATING CAQRs (NQAM)

- INVALID DETERMINATION BY MANAGEMENT REVIEW COMMITTEE
 - COORDINATED WITH INITIATOR IN BOTH REV. 3 AND REV. 4
 - ESCALATION OPTION STILL AVAILABLE IN BOTH REV. 3 AND REV. 4
 - DOCUMENT TRANSMITTED TO RIMS (NEW)
- INVALID DETERMINATION BY RESPONSIBLE ORGANIZATION
 - COORDINATES AND APPROVED BY MRC AND INITIATOR
 - ESCALATION TO SITE DIRECTOR (FINAL DETERMINATION)
 - DOCUMENT TRANSMITTED TO RIMS

C. TIMELINESS (NQAM)

- ESCALATION CRITERIA STRENGTHENED
 - ESCALATE WHEN LATE (NOT 30 DAYS LATER) EXCEPT C/A IMPLEMENTATION
- STRESS IMMEDIATELY THE IMPORTANT DECISIONS (SITE) (I.E.. OPERABILITY, REPORTABILITY, ABNORMAL EVENTS)

D. MANAGEMENT RESPONSIBILITY DEFINED (AI-12)

- MANAGEMENT REVIEW COMMITTEE DEFINED
 - RESPONSIBLE FOR DETERMINING IF CAQR OR PRD
 - POTENTIAL OPERABILITY
 - RESPONSIBLE ORGANIZATION
 - HARDWARE/SOFTWARE
 - INITIAL SCREENING FOR POTENTIAL REPORTABILITY
 - REVIEW FOR ABNORMAL EVENTS
 - APPROVING CORRECTIVE ACTION (UNLESS PORC APPROVAL IS REQUIRED)
 - ASSIGNING GENERIC REVIEWS (RESPONDING ORGANIZATION)

E. MANAGEMENT AWARENESS (NQAM)

- CAQRs SENT TO:
 - NSRB
 - EMPLOYEE CONCERNS
 - NUCLEAR EXPERIENCE REVIEW
- SECURITY IMMEDIATELY NOTIFIED OF CAQR AFFECTING SAFEGUARDS
- IMMEDIATE NOTIFICATION OF UPPER LEVEL MANAGEMENT OF ABNORMAL EVENTS

IV. BALANCE OF PLANT (NQAM)

A. PROBLEM REPORTING DOCUMENT (NQAM)

- USE FOR NON-QA SYSTEMS
- TRACKING SYSTEM UTILIZED
- ALLOWS ABILITY TO TREND
- ALLOWS MANAGEMENT TO CONTROL C/A PROGRAM

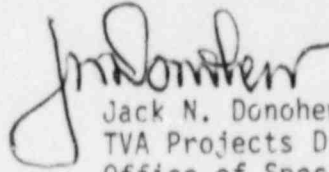
B. QA PROGRAM SCOPE (NQAM)

- DEFINES TOTAL C/A PROGRAM AS RELATED TO APPENDIX B ACTIVITIES
- ALLOWS USE OF PRD FOR ACTIVITIES OUTSIDE SCOPE OF QA PROGRAM

V. CONCLUSIONS

- COMMITMENTS TO EA 85-49
 - PREVIOUS REVISION NQAM WAS APPROVED BY NRC AS ACCEPTABLE FOR RESTART
 - REVISED PROGRAM
 - MORE MANAGEMENT INVOLVEMENT
 - GENERIC REVIEWS MORE TIMELY
 - STRESSES IMPORTANCE AND TIMELINESS OF OPERABILITY AND ABNORMAL EVENT REVIEWS
- TRAINING
 - TRAINING WAS CONDUCTED ON THE C/A PROCESS AS REQUIRED BY ORDER
 - PROGRAM CHANGES DID NOT AFFECT BASIS OF PREVIOUS TRAINING
 - TRAINING WAS CONDUCTED ON NEW PROCEDURE TO MANAGEMENT AND WORKERS
 - INFORMATION WAS DISCIMINATED TO PROVIDE SOURCE OF ANSWERS TO QUESTIONS REGARDING NEW PROCEDURE
 - SQN DISPATCH
 - ELECTRONIC BULLETIN BOARDS

in its Safety Evaluation on Order EA 85-49. Implementation of the CAQ program at Sequoyah will be monitored by the staff through its normal inspection activities.



Jack N. Donohew, Jr., Project Manager
TVA Projects Division
Office of Special Projects

Enclosures:

1. Attendee List
2. Corrective Action Meeting, September 8, 1988
3. Corrective Action Program Enhancements

cc w/enclosures:
See next page

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DATE	9/15/88	9/15/88	9/15/88	:	:	:	:

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