

From: Riedl, Christopher John <cjriedl@tva.gov>
Sent: Thursday, October 3, 2019 7:57 PM
To: Luina, Scott
Subject: [External_Sender] RE: Anchor Darling Letter

Still working on which emails to provide and how, but I would like to make one correction. The brainstorming session I mentioned in the last paragraph below came on January 11, not December 29. It was at the time of the revised commitment letter, not the initial response.

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From: Riedl, Christopher John
Sent: Thursday, October 03, 2019 2:23 PM
To: 'scott.luina@nrc.gov'
Subject: RE: Anchor Darling Letter

From my email history, it appears my recollection may have been a bit self-aggrandizing. It seems that Erin Henderson first raised the flag about problems with the letter, most likely because we did not initially have a commitment for Browns Ferry to repair their valves, making it inconsistent with SQN. Erin also raised a question from Bob Thacker to Engineering management concerning how we could say that our review was in general conformance with TP16-112R4 when we had not actually completed an evaluation against R4. (He later stated that was based on the fact that the CRs were still in DEVCAP status, not from specific knowledge that the review did not conform to R4.) Steve Norris confirmed that BFN had performed a review against Rev 4, though BFN did not yet know which valves contained a pressed-on collar.

When Beth and I revised the letter to address the commitment inconsistency, we performed a more thorough validation review to ensure we knew exactly what the response contained and aligning the commitments to make the cover letter information more accurate. We discovered that the cover letter indicated that the reviews were complete and schedules for repairs were provided in the enclosures. For BFN, that was not true, and I felt that we needed to add clarifying information in the letter and make commitments to provide the outstanding information. (I guess when I started pushing back in the line

organizations, I adopted the issues and made them mine. As with most everything in licensing, it is truly a result of a team effort.)

When management found out that we were out of line with the industry, because we committed to continued evaluation, they went back to licensing and BFN to make a final submittal, which we did with our January 11, 2018 submittal.

On December 29, 2017, Emerging Regulatory Issues Group had a bit of a brainstorming session to figure out what had gone wrong/what could be done better in developing the submittal. One item was that there should be better ownership of preparations for submittals in the responsible line organizations, in this case Browns Ferry Engineering. Beth Wetzel also noted that the CR referenced in the BFN Table of valve information was not treated as a CAQ, but as a review of OE information. Beth initiated CR 1372504 to indicate that the ADDDGV review actions should be treated as a CAQ. Accordingly, BFN upgraded CR 1334283 to CAQ status on January 3, 2018.

I am still here and available for discussion if you would like to talk further.

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From: Riedl, Christopher John
Sent: Thursday, October 03, 2019 11:23 AM
To: scott.luina@nrc.gov
Subject: Anchor Darling Letter.

I'll get you more details shortly, but it appears Russel handed the letter off to me on 12/22/17. The week of Christmas I worked on it, and apparently Beth was involved in getting it out based on emails 12/26 and 12/28.

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Hearing Identifier: JShea_IA_NonPublic
Email Number: 1045

Mail Envelope Properties (DM6PR09MB35477A9593C5EA54CBA64B5AB69F0)

Subject: [External_Sender] RE: Anchor Darling Letter
Sent Date: 10/3/2019 7:57:10 PM
Received Date: 10/3/2019 7:57:26 PM
From: Riedl, Christopher John

Created By: cjriedl@tva.gov

Recipients:
"Luina, Scott" <Scott.Luina@nrc.gov>
Tracking Status: None

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MESSAGE	5356	10/3/2019 7:57:26 PM

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date: