

From: Allen Fetter
Sent: Thursday, May 4, 2023 8:31 AM
To: ClinchRiver-CPSafRAIsPEm Resource; Deanna Zhang; Kerri Kavanagh; Michelle Hayes; Jordan Glisan; Schiele, Raymond Joseph
Subject: NRC Feedback questions on Tennessee Valley Authority's (TVA's) responses to eRAI-386
Attachments: TVA_QAPD TR_RAI response_NRC feedback questions.docx

Good Morning,

Attached are NRC feedback questions on TVA's response to eRAI-386. NRC transmitted eRAI-386 (ML23027A132) to TVA on January 27, 2023 and TVA provided response questions to the RAI questions (via TVA letter NNP-23-01, ML23054A158) on February 22, 2023.

These feedback questions are to support an upcoming clarification call on TVA's responses, and a summary of the clarification will be documented in the public administrative record.

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Review of TVA's Response to RAIs for NNP-TR-001

1. RAI 2, Part 2: The response states, "The following language has been included in a new paragraph two to Part II, Section I, "Organization" of the New Nuclear QAPD to clarify the relationship between New Nuclear Program and New Nuclear Projects:

The TVA New Nuclear organization is divided into two parts: New Nuclear Program and New Nuclear Projects. The New Nuclear Program addresses global infrastructure and programmatic matters with siting, licensing, and planning for multiple new nuclear projects across multiple sites. The New Nuclear Projects organization supports the engineering, procurement, construction, startup, and operational development activities of specific projects at designated sites."

Can TVA clarify what is meant by the sentence "The New Nuclear Program addresses global infrastructure and programmatic matters with siting..."

2. Part II, Section 1.2.2 of the QAPD, Revision 1, states, in part, that "The General Manager, Quality Assurance is the management position responsible for the nuclear operating fleet, vendors, and the TVA New Nuclear Program...The General Manager, Quality Assurance is responsible for planning and performing activities to verify the development and effective implementation of the Fleet QAPD. Effective implementation includes but is not limited to developing and maintaining the TVA Fleet QAPD, evaluating compliance to QAP requirements, assuring compliance with regulatory requirements and procedures through audits and technical reviews; monitoring organizational processes to ensure conformance to commitments and licensing document requirements; and ensuring that vendors providing quality services, parts, and materials to site projects are meeting the requirements of 10 CFR 50, Appendix B through NUPIC, joint utility, or TVA vendor audits."

Part II, Section 1.3.2.1 of the QAPD, Revision 1, states, in part, that "The General Manager, New Nuclear Projects Quality Assurance (QA) is the management position responsible for the quality aspects of New Nuclear Projects... The General Manager, New Nuclear Projects QA is responsible for planning and performing activities to verify the development and effective implementation of the New Nuclear QAPD. Effective implementation includes but is not limited to developing and maintaining the New Nuclear QAPD, evaluating compliance to QAP requirements, assuring compliance with regulatory requirements and procedures through audits and technical reviews, monitoring organizational processes to ensure conformance to commitments and licensing document requirements, and ensuring that vendors providing quality services, parts, and materials to site projects are meeting the requirements of 10 CFR 50, Appendix B through NUPIC, joint utility, or TVA vendor audits."

Can TVA confirm that the General Manager, Quality Assurance, would be responsible for establishing and implementing the QA program for TVA New Nuclear Program? If so, why is it only the General Manager, Nuclear Projects Quality Assurance the

management position responsible for “developing and maintaining the New Nuclear QAPD, evaluating compliance to QAP requirements, assuring compliance with regulatory requirements and procedures through audits and technical reviews, monitoring organizational processes to ensure conformance to commitments and licensing document requirements...”?

3. Part II, Section 2.5 of the QAPD, Revision 1, states, in part, that “Changes to the QAPD are evaluated by TVA New Nuclear QA to ensure that such changes do not degrade safety for previously approved quality assurance controls specified in the QAPD. New revisions to the document will be reviewed, at a minimum, by the General Manager, New Nuclear Quality Assurance and approved by the Senior Vice President, New Nuclear Projects.” However, in accordance with Part II, Section 1.2.2 of the QAPD, Revision 1, the General Manager, Quality Assurance, is responsible for the Fleet QAPD, whereas Part II, Section 1.3.2.1 of the QAPD, Revision 1, General Manager, New Nuclear Projects Quality Assurance is responsible for the the New Nuclear QAPD.

Can TVA address this discrepancy?

4. Part II, Section 2.6 of the QAPD, Revision 1, states, in part, that “the minimum qualification of the New Nuclear QA Manager is that the manager holds an engineering or related science degree...”

Can TVA clarify which New Nuclear QA Manager is this sentence referring to with respect the two specific QA manager descriptions provided in Part II, Section 1 of the QAPD, Revision 1, and the non-specific management role that will “direct and manage the onsite New Nuclear Project QA,” as described in Part II, Section 1.3.2.1 of the QAPD, Revision 1?

5. RAI 4, Part 3: The response states, “To the extent practical existing TVA Nuclear implementing procedures will apply to both New Nuclear Programs and New Nuclear Projects. Where TVA Nuclear implementing procedures cannot be applied to New Nuclear Projects, new procedures will be developed for use by New Nuclear Projects. No change was made to the New Nuclear QAPD.”

Part II, Section 2 of the QAPD, Revision 1, states, in part, that “New nuclear plant construction will be the responsibility of TVA New Nuclear organization. Detailed engineering specifications and construction procedures will be developed to implement the QAPD prior to commencement of pre-construction and/or construction activities. In general, the program requirements specified herein are detailed in implementing procedures that are either TVA New Nuclear implementing procedures, or supplier implementing procedures governed by a supplier quality assurance program.”

This description implies that specific construction procedures will be developed. Can TVA confirm this interpretation?

6. RAI 7, Part 1: The response to RAI 7, Part 1 states, “The New During the transition of a New Nuclear project from New Nuclear Quality Assurance Plan Part II, Section 1 “Organization” Section 1.3.2, paragraph two has been revised to read as follows:

...During the transition of a New Nuclear project from design/construction phase to operational phase as defined by programs and procedures, the Senior Vice President, New Nuclear Projects will interface with the Senior Vice President, Engineering and Operations Support to ensure that those positions required to support quality-related activities will retain their applicable responsibilities until it is deemed that they are no longer necessary.”

Can TVA clarify what is meant by “as defined by programs and procedures” in this context?

7. RAI 8, Part 2: There is a typo in the response. Specifically, a comma is missing between “electrical single line diagrams” and “structural systems for major facilities.”
8. RAI 9: The response provided a revision to Part II, Section 3.4 of the QAPD TR. Specifically, the words “...supplied by a supplier, Design Certification holder, or the plant’s technical staff” were added to the first bullet with respect to the written instructions that control setpoints. Can TVA confirm whether Standard Design Approval holder should also be included?