



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2881

October 26, 1999

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of)	Docket Nos.	50-259	50-390
Tennessee Valley Authority)		50-260	50-391
			50-296	50-438
			50-327	50-439
			50-328	

TVA NUCLEAR QUALITY ASSURANCE (NQA) PLAN - (TVA-NQA-PLN89-A) -
UPDATE - REVISION 9 - DESCRIPTION OF CHANGES

TVA's letter to NRC dated October 12, 1999, transmitted the NQA Plan, Revision 9. Since then, TVA has discovered that the description of changes (Enclosure 2 of the letter) contained some errors. Enclosure 2 incorrectly indicated that changes had been made to the list of abbreviations in the NQA Plan and also contained some section reference errors.

We apologize for any inconvenience that this may have caused. A revised description of changes, Enclosure 2, is enclosed to replace the previous one. If you have any questions, please contact R. M. Brown at (423) 751-7228.

Sincerely,

Mark J. Burzynski
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 Manager
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Enclosure

cc: See page 2

Q004

U.S. Nuclear Regulatory Commission
Page 2
October 26, 1999

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ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A), REVISION 9 DESCRIPTION OF CHANGES

<u>Section Changed in Revision 8</u>	<u>Change and Justification</u>
Policy Statement	Changed the name of the General Manager, Nuclear Assurance, to N. C. Kazanas. This change is an organization update.
1.0	<p>Changed "Tennessee Valley Authority Nuclear (TVAN)" to "Tennessee Valley Authority." This change clarifies that the QA requirements and responsibilities are applicable to TVAN and other TVA organizations as described in the NQA Plan.</p> <p>Deleted the sentence that referred to Appendix F for deferred nuclear plants. Appendix F was deleted in Revision 8 since the deferred plant QA program is no longer applicable. This change supports the Revision 8 change.</p>
2.0	Changed item (2) to eliminate Intergroup Agreements for TVA non-nuclear organizations that work directly under the TVAN QA program.
4.1, 4.1.2	Changed "TVAN" to "TVA." Also changed "non-TVAN" to "other" in section 4.1.2.A. These changes make the general functions specified in Section 4.1.2 applicable to TVAN and other TVA organizations that have responsibilities specified in the NQA Plan.
4.1.5.D	Relocated section 4.1.5.D to section 4.1.3.C and changed to delete the independent technical review function. This change shows the Nuclear Licensing Manager (Corporate) now reporting to the Vice President, Engineering and Technical Services. The deletion of the independent technical review function in Nuclear Licensing is supported by the establishment of an alternative to the way the independent technical review function is currently implemented by adding a description of responsibilities within the Engineering and Nuclear Business Services organizations (see related changes to sections 4.1.3.D. and 4.1.4 below).
4.1.3.D	Added a new section entitled "Engineering." This change shows responsibility for the independent technical review function.
4.1.4	Changed the title from "Nuclear Human Resources" to "Nuclear Support." This change reflects a new position of Vice President, Nuclear Support, with responsibility for Nuclear Human Resources, Security, and Nuclear Business Services. Nuclear Business Services has responsibility for reporting system performance and status to management in support of the independent technical review function that is specified in section 4.1.3.D.
4.1.7	Added a new section entitled "Procurement." This change specifies programmatic responsibilities for the Procurement organization in the nuclear program areas that it sponsors.
5.0	Changed the second and third paragraphs to clarify requirements for TVA non-nuclear organizations that perform activities within the scope of the nuclear quality assurance program.

<u>Section Changed in Revision 8 (continued)</u>	<u>Change and Justification</u>
5.1.A	Added reference to 10 CFR 72. This change addresses the applicability of the NQA Plan to the independent spent fuel storage installation activities as addressed in 10 CFR 72.140 (d).
5.4.B	Added reference to 10 CFR 72, Subpart G. Refer to the justification for the section 5.1.A change.
6.1.3.C	Changed "TVAN" to "TVA organizations that work directly under the TVA NQAP." This change clarifies that responsibilities are applicable to TVAN and other TVA organizations that are working directly under the TVAN QA program.
8.1.2.B.8	Added "as defined by Engineering" in the first line. This change clarifies that the Engineering organization is responsible to define technical and quality requirements in procurement documents.
8.1.3, 8.2.3, 8.3.3, and 9.6.3	Changed "Vice President, Engineering and Technical Services" to "Senior Vice President, Procurement" in sections 8.1.3.A, 8.1.3.B, 8.2.3.A, 8.2.3.B, 8.3.3.A, 8.3.3.B, 9.6.3.A, and 9.6.3.B. Deleted previous sections 8.1.3.C, 8.2.3.C, 8.3.3.C, and 9.6.3.C. Edited sections 8.1.3.B, 8.2.3.B, 8.3.3.B, and 9.6.3.B. These changes move procurement-related programmatic responsibilities from the Vice President, Engineering and Technical Services, to the Procurement organization.
9.9.2.A.4	Added a sentence to read: "Items 9.9.2.A.2.d and .e are not subject to the 10 CFR 50.59 review as they are governed by 10 CFR 50.54(q) and (p) respectively." This change clarifies the requirements that are applicable to the Radiological Emergency Plans [10 CFR 50.54(q)] and Security Plans [10 CFR 50.54(p)].
11.3.C	Changed "General Manager, Nuclear Human Resources" to "Vice President, Nuclear Support, through Nuclear Human Resources." This change reflects a new position of Vice President, Nuclear Support, with responsibility for Nuclear Human Resources.
14.1	Added reference to 10 CFR 72, Subpart G. Refer to the justification for the section 5.1.A change.
Appendix B, Table 1	Added reference to 10 CFR 72, Subpart G, and placed appropriate reference to Part 72 sections under each of the following columns: 6.1.4, 6.2.4, 6.3.4, 7.4, 8.1.4, 8.2.4, 8.3.4, 9.1.4, 9.3.4, 9.4.4, 9.5.4, 9.6.4, 9.7.4, 10.4, 11.4, and 12.4. Refer to the justification for the section 5.1.A change.
Appendix B, Table 2, Regulatory Guide 1.38	Changed in items 9 and 12, "Site Materials and Procurement" to "Procurement." This change is an organization name change only.
Appendix B, Regulatory Guide 1.88	Under the listing of WBN-specific records, deleted in item 10 reference to audits and section 12.2.E.5. This change is made for consistency with TVA's existing commitment to ANSI N45.2.9-1974 through Regulatory Guide 1.88. Audit records are classified as nonpermanent rather than lifetime in ANSI N45.2.9-1974.
Appendix H	Updated the organization charts to reflect the changes made in the body of the NQA Plan.