

July 25, 2000

Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

SUBJECT: BROWNS FERRY, WATTS BAR AND SEQUOYAH NUCLEAR
PLANTS - APPROVAL OF NUCLEAR QUALITY ASSURANCE PLAN
(TAC NOS. MA8574, MA8575, MA8576, MA8577, MA8578, MA8579)

Dear Mr. Scalice:

The U.S. Nuclear Regulatory Commission staff has reviewed the Tennessee Valley Authority (TVA) submittal, dated March 22, 2000, as supplemented on April 25 and June 13, 2000, requesting review and approval of the proposed revision to the quality assurance program described in TVA Nuclear Quality Assurance Plan TVA-NQA-PLN89-A. The change would revise the NQA Plan to standardize the requirements for plant reviews and the Plant Operations Review Committees (PORCs). The change was submitted as a reduction in commitment in accordance with Title 10, *Code of Federal Regulations* (10 CFR), Part 50, Section 54(a)(4).

The principal changes proposed by TVA are the elimination of plant reviews that are unique to individual TVA nuclear sites, a reduction in the threshold of items requiring PORC review, and a change of PORC composition requirements.

The changes to the plant review process are consistent with the applicable Standard Technical Specifications. The revised plant review program continues to conform to American National Standards Institute N18.7-1976, as endorsed by Regulatory Guide 1.33, Revision 2. The reduction in commitment continues to satisfy the criteria of Appendix B to 10 CFR Part 50 and applicable regulatory administrative control requirements and is therefore acceptable.

Our Safety Evaluation documenting the basis for this determination is enclosed.

Sincerely,

/RA/

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-390, 50-259, 50-260
50-296, 50-327 and 50-328

Enclosure: Safety Evaluation

cc w/enclosure: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A)
STANDARDIZATION OF PLANT REVIEWS AND PLANT OPERATING REVIEW COMMITTEE
TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR, SEQUOYAH NUCLEAR, WATTS BAR NUCLEAR PLANTS
DOCKET NOS. 50-259, 50-260, 50-296, 50-327, 50-328, 50-390

1.0 INTRODUCTION

By letter dated March 22, 2000, as revised by letters dated April 25 and June 13, 2000, the Tennessee Valley Authority (TVA, the licensee) submitted a proposed change to the quality assurance program described in Nuclear Quality Assurance (NQA) Plan TVA-NQA-PLN89-A. The change would revise the NQA Plan to standardize the requirements for plant reviews and the Plant Operations Review Committee (PORC). The change was submitted as a reduction in commitment in accordance with Title 10, *Code of Federal Regulations* (10 CFR), Part 50, Section 54(a)(4). The licensee states that the standardization is consistent with their current regulatory commitment to American National Standards Institute standard (ANSI) N18.7, as endorsed by Regulatory Guide 1.33.

2.0 BACKGROUND

Administrative controls are the provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner (10 CFR 50.36(b)(5)). Historically, administrative controls for plant reviews were incorporated into Section 6 of the Technical Specifications (TS) for each plant. In 1987, the Commission issued a proposed policy statement on TS improvements that encouraged licensees to update their TS to be consistent with vendor-specific Standard TS (STS) to be developed by the industry based on the policy statement criteria and subject to U.S. Nuclear Regulatory Commission (NRC) staff approval. Vendor-specific STS were subsequently issued as NUREG-1431 for Westinghouse plants and NUREG-1433 for General Electric (BWR/4) plants. STS for plant reviews are located in Section 5.5.1 of these documents. STS 5.5.1 incorporates by reference the STS for procedures (STS 5.7.1) and programs (STS 5.7.4).

The "Final Policy Statement on Technical Specifications Improvements for Nuclear Reactors," issued in 1993, indicated that certain items could be relocated from the TS to licensee-controlled documents. In 1998, the Commission issued amendments to the technical specifications for the Sequoyah and Browns Ferry nuclear plants. These amendments relocated certain administrative controls, including those for plant reviews and procedures, to

ENCLOSURE

the NQA Plan. Watts Bar Unit 1 administrative controls for plant reviews and procedures had been previously implemented into the NQA Plan as part of the original license, issued in 1996.

The licensee's plant review program is described in Section 9.9 of the NQA Plan. The descriptions of the plant review programs for the three sites differ primarily in that some reviews are unique to individual sites. The plant review programs conform to the guidance of ANSI N18.7-1976. All sites have approved qualified reviewer programs for reviews of procedures, procedure changes, and proposed changes to safety-related structures, systems, and components. In addition, each of the sites has a Plant Operations Review Committee, which provides an advisory function to the Plant Manager.

Regulatory Guide 1.33, Revision 2, endorses ANSI N18.7-1976 as a method acceptable to the NRC staff for complying with the Commission's regulations with regard to overall quality assurance program requirements for the operation phase of nuclear power plants. Section 5.2.15 of the standard describes an acceptable method for complying with Appendix B, Criterion VI, for document control, including review and approval of procedures and changes thereto. Section 4.4 of the standard describes an acceptable method for complying with the Commission's regulations related to onsite review activities.

Staff evaluations of proposed changes to license commitments are conducted in accordance with the guidance of NUREG-0800 the "Standard Review Plan" (SRP), which provides a well defined, uniform basis for staff evaluations of proposed changes to the license basis. Staff evaluations of proposed changes related to the licensee process for conducting reviews of operating phase activities that are important to safety are evaluated in accordance with SRP 13.4, "Operational Review."

3.0 EVALUATION

The licensee's current program for plant reviews is described in Section 9.9 of the NQA Plan, Revision 9. The licensee's program conforms to the guidance of ANSI N18.7, as endorsed by Regulatory Guide 1.33. The principal changes proposed by the licensee are the elimination of plant reviews that are unique to individual nuclear sites, a reduction in the threshold of items requiring PORC review, and a change of PORC composition requirements.

3.1 Scope of Plant Review

SRP 13.4 Acceptance Criterion II.1.a - Scope of this review should include that of Section 4.4 of ANSI N18.7, as endorsed by Regulatory Guide 1.33.

Evaluation: The proposed revision of the program requirements would explicitly retain the procedures specified in STS 5.7.1 and the applicable programs specified by STS 5.7.4. The plant review program incorporates by reference the applicable procedures recommended by Regulatory Guide 1.33.

Items requiring Plant Manager approval are reviewed by PORC. The threshold for PORC reviews would be raised to reduce the number of less significant issues that are presented to PORC. Plant reviews that would be eliminated from

the current scope of PORC review would continue to be reviewed within the scope of the Qualified Reviewer Program.

PORC review of Fire Protection program changes would be eliminated, since they have been specifically excepted by the NRC staff. For Browns Ferry, the PORC would review selected safety evaluations prepared in accordance with 10 CFR 50.59, to verify that such actions do not constitute an unreviewed safety evaluation. The selection methodology is described in implementing procedures and is consistent with the method already approved for Watts Bar and Sequoyah. These exceptions to the scope of PORC reviews are acceptable.

The scope of the licensee's plant review program is consistent with the applicable guidance of ANSI N18.7, the Standard Technical Specifications, and the Standard Review Plan and is, therefore, acceptable.

3.2 Interdisciplinary Reviews

SRP 13.4 Acceptance Criterion II.1.b - Organizational arrangements should provide for interdisciplinary reviews of subject matter.

Evaluation: Requirements for interdisciplinary reviews are not changed by the proposed revision of the NQA Plan.

3.3 Qualifications for Review Personnel

SRP 13.4 Acceptance Criterion II.1.c - Qualification levels for plant staff personnel performing review should be at least equivalent to those described in Section 4.4 of ANSI N18.1 as endorsed by Regulatory Guide 1.8.

Evaluation: Qualification requirements for qualified reviewers are unchanged by the proposed revision to the NQA Plan. For PORC members, the submittal proposes to revise the PORC composition requirements to be representative of plant functional areas instead of the current position-based membership. Qualification requirements for PORC members will continue to meet the requirements of ANSI N18.1-1971 and ANSI/ANS 3.1-1981 for the current manager or supervisor positions. These qualification requirements effectively maintain the current qualification requirements for PORC members. The qualification requirements conform to the guidance of ANSI N18.1, as endorsed by Regulatory Guide 1.8, and are, therefore, acceptable.

3.4 Documentation and Reporting

SRP 13.4 Acceptance Criterion II.1.d - Review activities should be documented and results forwarded to appropriate members of management.

Documentation and reporting requirements are not changed by the proposed revision of the NQA Plan.

4.0 CONCLUSION

The proposed change to the licensee's quality assurance program conforms to the applicable guidelines ANSI N18.7-1976, as endorsed by Regulatory Guide 1.33, Revision 2. The plant review process is consistent with the applicable guidelines of the STS. The revised plant review process satisfies the acceptance criteria of SRP 13.4 for plant staff review. The staff finds that the proposed revision to the plant review process described in the TVA NQA Plan is consistent with applicable regulatory guidelines, will continue to satisfy the criteria of Appendix B to 10 CFR Part 50, and is, therefore, acceptable.

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Date: July 25, 2000

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**BROWNS FERRY NUCLEAR PLANT
SEQUOYAH NUCLEAR PLANT
WATTS BAR NUCLEAR PLANT**

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**BROWNS FERRY NUCLEAR PLANT
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