



1101 Market Street, Chattanooga, Tennessee 37402

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

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Sequoyah Nuclear Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Units 1 and 2
Facility Operating License Nos. NPF-90 and NPF-96
NRC Docket Nos. 50-390 and 50-391

Subject: Results of the Review of Previous TVA Confirmatory Orders as Required by NRC
Confirmatory Order EA-17-022

Reference Letter from NRC to TVA, "Confirmatory Order (Nuclear Regulatory
Commission Inspection Report 05000390/2016013, 05000391/2016013),
July 27, 2017 (ML17208A596).

By letter dated July 27, 2017 (Reference 1), the NRC issued a Confirmatory Order (EA-17-022) to the Tennessee Valley Authority (TVA), as a result of an alternative dispute resolution (ADR) session that was conducted on June 9, 2017. The Confirmatory Order confirmed commitments made as part of the settlement agreement reached during the ADR. Section V.1.f.1.a of Confirmatory Order EA-17-022 documented TVA's agreement to conduct a review of all Confirmatory Orders previously issued to TVA. This review was completed as required by November 27, 2017. Furthermore, Section V.1.f.1.a. of the Order required TVA to submit the results of the review within one month of its completion. The purpose of this letter is to submit the results of the completed review as required in Reference 1.

Section V.1.f.1.a specifically stated that:

Within four months of issuance of the CO [Confirmatory Order], TVA shall conduct a review of all previously issued COs. TVA shall submit the results of the review to the NRC within one month of completion of the review. The review shall entail:

- i) an assessment of the safety impact of CC-03 [CC-03 is contributing cause 3 from TVA's Root Cause for TVA Condition Report (CR) 1271309] on the nuclear fleet;
- ii) an evaluation of compliance with previously issued COs;
- iii) periods of time when TVA was not in compliance with previously issued COs;
- iv) corrective actions taken and planned and timeline to restore compliance, and corrective actions taken and planned to preclude recurrence.

The Enclosure to this letter provides the details of the review. TVA did not identify any potential safety impacts as a result of the review. This review did identify several instances of limited, past periods of non-compliance. The identified non-compliances were entered into the Corrective Action Program (CAP). As a corrective action and as required by CO EA-17-022, TVA has developed new fleet governance for managing Confirmatory Orders to ensure that current and future CO requirements continue to be met.

TVA assembled the detailed documentation that supports the review specified in Section V.1.f.1.a. of the Order. The detailed documentation is available for NRC inspection.

There are no new regulatory commitments associated with this submittal. For questions related to this, please contact Erin Henderson at (423) 751-7620.

Respectfully,



J. W. Shea
Vice President, Nuclear Regulatory Affairs and Support Services

Enclosure:

Previously - Issued Confirmatory Order Review Results

cc: (with Enclosure)

NRC Regional Administrator
NRC Resident Inspector – Browns Ferry
NRC Resident Inspector – Sequoyah
NRC Resident Inspector – Watts Bar
NRC Project Manager – Browns Ferry
NRC Project Manager – Sequoyah
NRC Project Manager – Watts Bar

Enclosure
Previously-Issued Confirmatory Order Review Results

Introduction

The Nuclear Regulatory Commission (NRC) issued Confirmatory Order (CO) EA-17-022 to the Tennessee Valley Authority (TVA) on July 27, 2017. Confirmatory Order EA-17-022 contained the following requirement in Section V paragraph 1.f.1.:

- a) Within four months of issuance of the CO, TVA shall conduct a review of all previously issued COs. TVA shall submit the results of the review to the NRC within one month of completion of the review. The review shall entail:
 - i) an assessment of the safety impact of CC-03 on the nuclear fleet;
 - ii) an evaluation of compliance with previously issued COs;
 - iii) identification of periods of time when TVA was not in compliance with previously issued COs;
 - iv) corrective actions taken and planned and timeline to restore compliance, and corrective actions taken and planned to preclude recurrence.

To perform the detailed review of the previously issued COs above, TVA assembled a team consisting of independent reviewers with extensive regulatory experience, independent engineering personnel, TVA staff, and former TVA staff with extensive licensing experience.

The team developed a comprehensive list of CO's previously issued to TVA by utilizing two independent, nuclear industry document search and retrieval companies. The companies independently searched their document databases to develop lists of potential COs. To develop a reconciled, high confidence list of the previously issued CO's to TVA, the CO review team compared the search results from the two document retrieval companies and ascertained the final list of applicable COs is provided in Table 1 of this letter.

This letter provides the summary of the review and is organized according to each of the sub-elements (i-iv) of CO V.1.f.1.a., including a restatement of the requirement and the results of the review. Section 1 addressing CO V.1.f.1.a.ii is presented first as it contains the evaluation of compliance with the previous Confirmatory Orders identified by TVA. Section 2 provides periods of time when TVA was not in compliance with the COs identified in Section 1 as required by CO V.1.f.1.a.iii. Section 3 provides an analysis of the safety impacts of the identified non-compliances as required by CO V.1.f.1.a.1. Section 4 outlines the corrective actions taken or planned to restore compliance as required by CO V.1.f.1.a.iv. The detailed information supporting TVA's assessment is available for NRC review.

Section 1 - Requirement V.1.f.1.a.ii.:

"The review shall entail...an evaluation of compliance with previously issued COs."

Review:

The list provided in Table 1 identifies the previously issued COs in the scope of this review based on the consolidated list developed using two document retrieval company reviews as previously discussed. The review determined that in addition to the Confirmatory Order which was the subject of ADR, there were 19 previously issued COs for which TVA is required to evaluate compliance. The Review Summary column in Table 1 provides the overall conclusion of TVA's review which will be discussed further in subsequent sections. In summary, TVA's review did not identify non-compliances with sixteen of the nineteen COs. There were, however, periods of time when TVA was not in compliance with three COs (EA-08-211, EA-12-021, EA-14-005). The specifics of those identified non-compliances are discussed in more detail in Section 2.

Table 1: Confirmatory Orders Issued to the Tennessee Valley Authority				
Item	Date issued	TVA Units	Title	Review Summary
1	1/2/1980	Browns Ferry Unit 1	Confirmatory Order regarding utility 791017 & 1116 commitments to implement all Lessons Learned Task Force NUREG-0578 Category A requirements.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
2	4/4/1980	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3 Sequoyah Unit 1	Confirmatory Order to formalize commitments regarding responses to IE Bulletin 79-29, "Loss of Nonclass 1-E Instrumentation and Control Power Bus During Operation."	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
3	10/2/1980	Browns Ferry Unit 1	Confirmatory Order confirming utility commitments to implement actions regarding IE Bulletin 80-17 (BWR Scram Discharge Volume)	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
4	7/10/1981	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3	Confirmatory Order confirming licensee commitments to post-TMI related requirements of NUREG-0737	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
5	3/25/1983	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3	Confirmatory Orders confirming licensee commitment to implement post-TMI-related items, based on Generic Letters 82-05 & 82-10.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
6	6/24/1983	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3	Confirmatory Orders regarding commitments to install permanent scram discharge system modifications during Cycle 5 outages.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
7	8/26/1983	Browns Ferry Unit 3	Order related to Intergranular Stress Corrosion Cracking Inspection.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
8	12/12/1983 3/25/1983	Browns Ferry Unit 1	Order extending time until prior to startup in Cycle 7 for completion of NUREG-0737, Item II.F.1.3, required in 830325 order confirming licensee commitments on post-TMI-related issues.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
9	12/19/1983	Browns Ferry Unit 1	Confirmatory Order on licensee commitments on pipe crack-related issues - safety evaluation accepting licensee actions to correct IGSCC. Plant restart authorized.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
10	6/12/1984	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3	Order Confirming Commitments on Emergency Response Capability.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
11	6/15/1984	Sequoyah Unit 1 Sequoyah Unit 2	Confirmatory Order confirming licensee commitments on Emergency Response Capability.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
12	7/13/1984	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3	Confirmatory Order EA-84-54 regarding utility commitments to regulatory performance improvement plan.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.

13	8/24/1984	Browns Ferry Unit 3	Confirmatory Order for modification to 830325 Order confirming licensee commitments on post-TMI related issues. Order extends time to complete NUREG-0737, Item II.F.1.3 until prior to Cycle 7 startup.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
14	4/29/1998	Sequoyah Unit 1 Sequoyah Unit 2	Confirmatory Order regarding Thermo-Lag 330-1 fire barrier corrective actions.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
15	6/18/1998	Sequoyah Unit 1 Sequoyah Unit 2	Confirmatory Order confirming TVA's commitment, as stated in letter dated 06/25/97, to complete implementation of Thermo-Lag 330-1 fire barriers corrective actions by 06/30/99.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
16	1/5/2009	Sequoyah Unit 1 Sequoyah Unit 2	Confirmatory Order EA-08-211 - ADR commitment regarding contract security sergeant falsification of inventory form.	Based on the review conducted, TVA identified instances of non-compliance related to this confirmatory order. There is no safety impact due to the periods of non-compliance. CR 1362399 and 1292073 were written to document the findings.
17	12/22/2009	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3 Sequoyah Unit 1 Sequoyah Unit 2 Watts Bar Unit 1 Watts Bar Unit 2	Confirmatory Order EA-09-009/EA-09-203 - Agreement reached during Alternate Dispute Resolution for discrimination against employees engaged in protected activities.	Non-compliances with EA-09-009/EA-09-203 were previously documented in Reference 23.
18	5/16/2012	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3	Confirmatory Order EA-12-024 for submittal of License Amendment Request for transition of Fire Protection requirements to NFPA-805.	Based on the review conducted, TVA did not identify periods of non-compliance related to this confirmatory order.
19	6/18/2012	Watts Bar Unit 2	Confirmatory Order EA-12-021 regarding falsification of work order packages for primary containment penetrations by electrician and foreman employed by a subcontractor.	Based on the review conducted, TVA identified instances of non-compliance related to this confirmatory order. There is no safety impact due to the periods of non-compliance. CRs 1362399, 1292108, and 1280168 were written to document the findings.
20	5/1/2014	Browns Ferry Unit 1 Browns Ferry Unit 2 Browns Ferry Unit 3	Confirmatory Order EA-14-005 regarding minimum staffing requirements. 10 CFR 50.9 Completeness and Accuracy requirements.	Based on the review conducted, TVA identified instances of non-compliance related to this confirmatory order. There is no safety impact due to the periods of non-compliance. CR 1362399 was written to document the findings.

Section 2 - Requirement V.1.f.1.a.iii.:

“The review shall entail... periods of time when TVA was not in compliance with previously issued COs.”

Review:

As noted in Table 1, TVA’s review did not identify non-compliances with sixteen of the nineteen previously issued COs. There were, however, periods of time when TVA was not in compliance with three COs (EA-08-211, EA-12-021, EA-14-005). Those non-compliances are discussed in more detail below.

To support the review, the numbering below is consistent with the numbering in Sections 3 that provides the corresponding safety significance of the non-compliances and Section 4 that provides the corresponding corrective actions:

1. EA-08-211 (Reference 3) Requirement V.b: The requirement was to provide fleet-wide training for security supervisors. After transitioning to an in-house security force, TVA was required to ensure security supervisors receive training consistent with first line supervisors in other disciplines. Records indicate that training given up to a year before issuance of the CO was credited toward meeting this requirement.
2. EA-08-211 Requirement V.c: The requirement to train security personnel on resolution of issues and deficiencies was removed in January 2017 when the industry-wide format for General Employee Training (GET) was adopted. TVA had a period of non-compliance with the CO from January 2017 until May 2017, when corrective action was initiated.
3. EA-08-211 Requirement V.f: The requirement specified that bi-monthly meetings be held between TVA and its security contractor until the transition to an in-house security force was completed. Records indicate there was a month (May 2009) when only one monthly meeting was held at Browns Ferry.
4. EA-12-021 (Reference 5) Requirement c: The requirement included updating major contracts existing at that time to include a requirement to comply with TVA’s Procedure Use and Adherence procedure. Revisions were to be completed by December 21, 2012. While TVA proposed updates to all major contracts by the required date, a sample of the contracts indicated that some revised contracts were not in place and effective until more than a year after the required date. This delay in compliance was because approvals of the revised contract language were required from the respective vendors following contract negotiations.
5. EA-12-021 Requirement c: The requirement was to revise the procedures governing procedure use and adherence. While a NPG-SPP-01.2, “Administration of Site Technical Procedures,” was revised in a procedural section titled, “Procedure Use and Adherence,” to initially complete this action, the procedure NPG-SPP-22.207, “Procedure Use and Adherence,” was not revised. The period of non-compliance continued from December 22, 2012 until June 1, 2017 when corrective actions were initiated.

6. EA-12-021 Requirement f: The requirement was to enhance the existing 10 CFR 50.9-related GET. The portion of GET related to 10 CFR 50.9 was removed in January 2017, when TVA adopted the industry-wide format for GET. The period of non-compliance continued until October 25, 2017 when corrective actions were initiated.
7. EA-14-005 (Reference 6) Requirement V.1.b.i.2: The requirement was to create a Licensing Compliance Review procedure and conduct training of impacted personnel in accordance with the procedure change process. Though the training was done in conjunction with procedure implementation, a number of plant departments responsible for areas covered in the procedure did not have a representative at the training.
8. EA-14-005 Requirement V.1.b.ii.6: The requirement was to conduct peer reviews of Browns Ferry (BFN) licensing commitment changes until training required under 1.b.ii.5 was completed. The required training was documented as having been completed on October 1, 2014. However there were BFN commitment changes processed by Corporate Licensing staff that did not receive the required peer reviews during the period of time that this requirement was in effect.

The non-compliances discovered during this review validated the contributing cause finding of TVA's Level 1 RCA (reference 2) that TVA lacked a consistent holistic approach for ensuring that CO requirements are adopted, implemented, and maintained. TVA's review and the Level 1 RCA (reference 2) noted TVA's overall non-compliance with EA-09-009 from 2011-2016 relative to implementation of CO EA-09-009, Section V.1, as well as the protection and administrative tracking of other Section V CO requirements (e.g., training, information booklet, etc.).

As a corrective action to address the lack of a consistent holistic approach for ensuring that CO requirements are put in place, implemented, and maintained TVA has developed new fleet governance which establishes a process for addressing any potential COs in the future and to provide process protections for CO related actions. This action is required to be completed within 6 months of issuance of the recent CO.

Section 3 - Requirement V.1.f.1.a.i.:

"The review shall entail...an assessment of the safety impact of CC-03 on the nuclear fleet."

Review:

As noted in Section III.2 of the NRC CO, TVA had (prior to issuance of the Order) performed a Level I Root Cause Analysis (RCA) of the potential violation (Reference 2). TVA's RCA identified a deficiency in TVA's holistic framework for managing COs as a contributing cause (CC-03) for the violation.

As documented in Table 1 and Section 2, TVA identified several non-compliances with previous COs. However, any gaps in compliance related to on-going actions were previously identified and corrected or have been documented in the corrective action program for resolution as result of this review. Several of the non-compliances related to deficient implementation of one-time actions (e.g., one-time training sessions). The balance of the non-compliances involved administrative, procedural, and/or training requirements.

Each of the instances of non-compliance were assessed individually for safety significance. The basis for the assessment of no safety significant impact for the above items is discussed below.

1. EA-08-211 (Reference 3) Requirement V.b: The failure to retrain security supervisors after the Order was issued was mitigated by the fact that TVA subsequently transitioned to an in-house security force approximately six months later. Any contract supervisors who continued as supervisors under the in-house security force were trained during the onboarding process as new TVA employees.
2. EA-08-211 Requirement V.c: The failure to have training on internal resolutions/deficiencies in GET had no safety significant impact given that it was only absent from the training material for a short time. This absence was discovered and the training material was re-instituted within five months (Jan-May 2017).
3. EA-08-211 Requirement V.f: Numerous meetings between TVA and its security contractor were held as required (and documented) as the transition occurred. Although a successful transition of the security department occurred, in most cases, documentation that the bi-monthly meetings were held could not be located.
4. EA-12-021 (Reference 5) Requirement c: The lack of having TVA's proposed language regarding Procedure Use and Adherence formally ratified in all major contracts by the specified date had no safety significant impact because by proposing the change, TVA had put all vendors on notice of its intent prior to the CO due date.
5. EA-12-021 Requirement c: The failure to comprehensively revise the procedures relative to procedure use and adherence had no safety significant impact as the procedure that was actually altered (NPG-SPP-01.2) provided the technical governance for the update in contract wording. The remaining procedure to be updated (NPG-SPP-22.207) provided referential support only.
6. EA-12-021 Requirement f: The failure to have training on 10 CFR 50.9 in GET had no safety significant impact given that it was only absent from the training material for a short time. This absence was discovered and the training material was re-instituted within ten months (January-October 2017).
7. EA-14-005 (Reference 6) Requirement V.1.b.i.2: The failure of certain departments at Browns Ferry to have representatives attend the training on the Licensing compliance procedure was offset by the fact that the Licensing department, which was well represented at the training, would be available for questions or support of Licensing compliance related procedure changes, procedural implementation of the licensing compliance review checklist, and Independent Qualified Reviewer required reviews ensuring checklist execution.
8. EA-14-005 Requirement V.1.b.ii.6: The failure to do peer reviews on some Browns Ferry licensing commitments during a period of transition was offset by the fact that the commitments that were approved during this time dealt with schedule changes and were not substantive commitment changes. They were, however, subsequently peer reviewed.

After its review of previously issued COs, and considering the results of the safety significance of the individual instances of non-compliance above, TVA has assessed that the deficiency in the holistic framework for managing COs had no safety significant impact.

Section 4 - Requirement V.1.f.1.a.iv.:

“The review shall entail...corrective actions taken and planned and timeline to restore compliance, and corrective actions taken and planned to prevent recurrence.”

Review:

While it was determined that these past non-compliances as discussed in Section 3 had no safety significant impact, TVA recognizes the need to maintain regulatory compliance by fully implementing and maintaining the requirements of any CO. To minimize the potential for future non-compliances with COs TVA has developed new fleet governance in the existing procedure NPG-SPP-03.12, “Technical Specifications/Licenses And Amendments,” to specifically address management of Confirmatory Orders to ensure that current and future CO requirements continue to be met.

As stated above, this review did not identify any current conditions of non-compliance. Gaps in compliance had either been previously identified and corrected, or involved incomplete or deficient past implementation of a one-time (not ongoing or enduring) action. The corrective actions taken, planned, and/or timeline to restore compliance for the non-compliances discussed above are listed below:

1. EA-08-211 (Reference 3) Requirement V.b: CR 1362399 documents the non-compliance with EA-08-211 regarding the fleet-wide training required for security supervisors. Specifically, there is a need to conduct a historical review due to the manner in which previous training was credited during the transition to in-house security. Assessing whether a gap exists in supervisory training due to the transition requires further review which currently has a due date of February 9, 2018. Compliance is currently restored relative to the ongoing requirement for security supervisor training because security supervisors receive supervisory training consistent with other disciplines.
2. EA-08-211 Requirement V.c: CR 1292073 documents this short duration non-compliance with EA-08-211 from January to May 2017 regarding training of security personnel on internal resolutions/deficiencies when the corrective actions were initiated to restore compliance. The corrective action to the annual training was completed and compliance was restored in May 2017.
3. EA-08-211 Requirement V.f: CR 1362399 documents this non-compliance with EA-08-211 regarding the failure to conduct one site bi-monthly security transition meeting. Because one instance of a missed or not properly documented meeting had no impact on the successful transition of the security organization, corrective action is complete for this defined period. This CO requirement is no longer applicable therefore no further corrective action is required to restore compliance.
4. EA-12-021 (Reference 5) Requirement c: CR 1362399 documents this non-compliance with EA-12-021 regarding ratification of procedure use and adherence wording in TVA contracts and the CR resolution documented that contracts were properly updated. The non-compliance relative to this CO is that some of the contract changes were late due to contract negotiations that did not complete on existing contracts until after the date required by the CO. Contracts initiated after the CO include the required wording therefore no further corrective action is required to restore compliance.

5. EA-12-021 Requirement c: CR 1292108 documented this non-compliance with EA-12-021 regarding the need to revise the procedure on procedure use and adherence to reinforce the requirements of 10 CFR 50.9. The corrective action to revise the procedure was completed and compliance was restored in June 2017.
6. EA-12-021 Requirement f: CR 1280168 documents this short duration non-compliance with EA-12-021 from January - October, 2017 regarding training on 10 CFR 50.9 when the corrective actions were initiated to restore compliance. The corrective action to develop and implement a training module for new and existing employees at TVA nuclear sites was completed and the training was assigned in the training management system in October 2017, thereby restoring compliance.
7. EA-14-005 (Reference 6) Requirement V.1.b.i.2: CR 1362399 documents this non-compliance with EA-14-005 regarding incomplete organizational representation during licensing compliance procedure training. The CR resolution documents that the procedural implementation of the licensing compliance review checklist and Independent Qualified Reviewer required reviews ensuring checklist execution implemented the above procedurally. While TVA did not adequately ensure adequate attendance at training during the procedure change process, TVA is currently in compliance with the ongoing requirement to have procedural guidance for a licensing compliance review.
8. EA-14-005 Requirement V.1.b.ii.6: CR 1362399 documents this non-compliance with EA-14-005 regarding the failure to conduct peer reviews of Browns Ferry commitment changes during the required review period. The review determined the commitment changes that were not peer reviewed were related to schedule changes and not substantive in nature. This CO requirement was only applicable through December 31, 2014, therefore no further corrective action is required to restore compliance.

In addition to the non-compliances previously discussed in Section 2, the review team identified several examples that could present a vulnerability to compliance in the future due to weak or a lack of procedural source noting or other process barriers. As a result, actions will be taken to prevent the potential for non-compliances in the future. These have been documented in CAP (CR 1362399):

1. EA-08-211 Requirement a: TVA revised procedures WBN SSI-17.1, Security Records Management, Revision 1 (Watts Bar) and SQN SSI-17.1 and Security Records Management, Revision 4 (Sequoyah), but the source note is to the related TVA Licensing commitment package and not the NRC Order.
2. EA-09-009 Requirement h: TVA was required to modify its contractor in-processing to include a presentation on the concerns resolution program and SCWE. While the training continues to be given, the requirement to give the training is no longer procedurally connected to the CO. Initially, TVA Nuclear Power Group Business Practice (BP)-108 Rev 16, contained this requirement but the present revision of the BP does not contain the requirement and no other document was found that tied this training to the CO.
3. EA-09-009 Requirement i: TVA was required to modify its new supervisory training to incorporate a classroom discussion on employee protection and SCWE. While the training continues to be given, the method to maintain compliance with the

classroom discussion portion changed over time necessitating a review to ensure the CO intent is not lost.

4. EA-12-021 Requirement c: Required procedure revisions to BPP-01.1 (Bellefonte Procedure for Administration of Site Administrative Procedures) – Section 3.1.7 and BPP-01.2 (Bellefonte Procedure for Administration of Site Technical Procedures) – Section 3.3 have procedure adherence statements and references to 10 CFR 50.9. However, these sections are not source noted to the CO.
5. EA-14-005 Requirement 1.b.i.3: The revisions to NPG-SPP-01.1, “Administration of Standard Programs & Processes (SPPs); Standard Department Procedures (SDPs); and Business Practices (BPs),” Revision 5, and NPG-SPP-01.2, “Administration of Site Technical Procedures,” Revision 11, initiated to implement the Order contained a source note with respect to incorporation of NPG-SPP-3.14, “Licensing Compliance Review.” However, those source notes did not refer specifically to the Confirmatory Order. The latest revision of NPG-SPP-01.1 (Rev 9) contains that same weakness. The latest revision of NPG-SPP-01.2 (Rev 15) also contains that weakness but in addition, there is now no tie between the referenced procedure and the source note. The annotation was not completed.
6. EA-14-005 Requirement 1.c: The required report is referenced in Source Note C.2 of the current revision of Operations Standard Departmental Procedure, OPDP-1, Conduct of Operations, (Revision 39). However, the source note is not the CO.

The above discussed actions were also assigned via the Corrective Action Program (CAP) to organizations responsible for their respective procedures to initiate procedure changes to add proper source noting in accordance with the protection requirements described in the revised NPG-SPP-03.12.

While not a non-compliance, one additional observation was made by the TVA review team during its review:

For NRC Order dated July 10, 1981 regarding NUREG-0737, item II.K.3.3 required reporting of challenges or failures of Safety and Relief valves at Browns Ferry. TVA implemented this requirement by including the reporting requirement in the Annual Operating Report (AOR) required by Technical Specifications. Later, as part of the transition from custom Technical Specifications to Improved Standard Technical Specifications, the requirement for the AOR was eliminated. This Technical Specification amendment was approved by NRC. However, in reviewing TVA's License Amendment Request, it was noted that the justification for removing the AOR did not reference the July 10, 1981 Order nor NUREG-0737.

TVA has assembled the documentation that supports this review of previously issued COs and the corrective actions taken/planned as a result of the review. This documentation is available for NRC review and inspection.

References

1. Letter from NRC to TVA, "Confirmatory Order (Nuclear Regulatory Commission Inspection Report 05000390/2016013, 05000391/2016013), July 27, 2017 (ML17208A596).
2. TVA Nuclear Power Group, Performance of a Level I Root Cause Analysis (RCA), COC condition report (CR) 1271309, WBN Failure to Implement Adverse Employment Action Process, dated May 26, 2017.
3. Letter from NRC to TVA, "Confirmatory Order (Effective Immediately)[NRC Office of Investigation Report No. 2-20070025], dated January 5, 2009 (ML090050244).
4. Letter from NRC to TVA, "Confirmatory Order (Effective Immediately)(Office of Investigation Report Nos. 2-2006-025 & 2-2009-003), dated December 22, 2009.
5. Letter from NRC to TVA, "Confirmatory Order (Effective Immediately)[NRC Office of Investigation Report No. 2-2011-003], dated June 18, 2012 (ML12173A008).
6. Letter from NRC to TVA, "Confirmatory Order (NRC Inspection Report 05000259/2013005, 05000260/2013005, and 05000296/2013005), dated May 1, 2014 (ML14121A551).
7. Letter from NRC to TVA, dated January 2, 1980 (Confirmatory Order for Browns Ferry Unit No. 1).
8. Letter from NRC to TVA, dated April 4, 1980 (Confirmatory Orders).
9. Letter from NRC to TVA, dated October 2, 1980 (Confirmatory Orders regarding IE Bulletin No. 80-17).
10. Letter from NRC to TVA, dated March 25, 1983 (Orders confirming commitments to implement post-TMI related items set forth in NUREG-0737).
11. Letter from NRC to TVA, dated June 24, 1983 (Confirmatory Orders for Browns Ferry Nuclear Plant, Units 1 and 3).
12. Letter from NRC to TVA, "IGSCC Inspection Order Confirming Shutdown," dated August 26, 1983.
13. Letter from NRC to TVA, "Modification of March 25, 1983 Order Confirming Licensee Commitments on Post-TMI Related Issues," dated December 12, 1983.
14. Letter from NRC to TVA, dated December 19, 1983 (inspection of recirculation system piping).
15. Letter from NRC to TVA, "Report Nos. 50-259, 260, 296/84-09; 50-327, 328/84-08; 50-390/84-24; 50-391/84-19; and 50-438, 439/84-07," dated June 12, 1984.
16. Letter from NRC to TVA, "Issuance of Orders Confirming Licensee Commitments on Emergency Response Capability," dated June 15, 1984.
17. Letter from NRC to TVA, dated August 24, 1984 (Order for Modification of March 25, 1983 Order).
18. Letter from NRC to TVA, "Sequoyah Nuclear Plant, Units 1 and 2 – Consent to Confirmatory Order Modifying License (TAC Nos. M85604 and M85605), dated April 29, 1998 (ML013320078).
19. Letter from NRC to TVA, "Confirmatory Order Modifying License," dated June 18, 1998 (ML013320074).
20. Letter from NRC to TVA, "Order Confirming Licensee Commitments on Post-TMI Related Issues," dated July 10, 1981.
21. Letter from NRC to TVA, "Confirmatory Order EA-84-54 (Reference Report Nos. 50-259/84-02, 50-260/84-02, 50-296/84-02, 50-259/83-60, 50-260/83-60, and 50-296/83-60), dated July 13, 1984.
22. Letter from NRC to TVA, "Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Confirmatory Order (Effective Immediately)," dated May 18, 2012 (ML12053A188).
23. Letter from NRC to TVA, "Watts Bar Nuclear Plant – NRC Problem Identification and Resolution Inspection (Part 2); and Safety Conscious Work Environment Issue of Concern Follow-Up; NRC Inspection Report 05000390/2016013, 05000391/2016013, dated March 10, 2017 (ML17069A133).