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# TENNESSEE VALLEY AUTHORITY

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U.S. Nuclear Regulatory Commission
Region II
Attention: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - RESPONSE TO VIOLATION 390/86-12-08; 391/86-13-08 - FAILURE TO FOLLOW PROCEDURE OF G-53 AND WBN-QCP-1.42-3 - AND RESPONSE TO VIOLATION 390/86-12-10; 391/86-13-10 - FAILURE TO PROMPTLY IDENTIFY AND CORRECT A CONDITION ADVERSE TO QUALITY

This is in response to Roger D. Walker's letter dated June 24, 1986, Report Numbers 50-390/86-12 and 50-391/86-13, citing activities at the Watts Bar Nuclear Plant which appeared to be in violation of NRC regulations. Enclosed is our response to the citation.

To the best of my knowledge, I declare the statements contained herein are complete and true.

If there are any questions, please get in touch with J. A. McDonald at (615) 365-8527.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. L. Gridley, Director
Nuclear Safety and Licensing

Enclosure
cc (Enclosure):
Mr. James Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO NRC REGION II LETTER
FROM ROGER D. WALKER TO S. A. WHITE, DATED JUNE 24, 1986
(Reference: Report Numbers 50-390/86-12 and 391/86-13)

This report responds to the notice of violation described in enclosure 1 of the NRC Region II inspection report referenced above. This is our final report on this item of noncompliance.

Violation 390/86-12-08; 391/86-13-08

10 CFR 50, Appendix B, criterion V, as implemented by TVA's QA Topical Report TVA-TR-75-1A, revision 8, paragraph 17.1.5, requires that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures. TVA Specification G-53 specifies the requirements of the 1972 ASTM Standard. TVA adopted this requirement in quality control procedure WBN-QCP-1.42-3, revision 5.

Contrary to the above, on May 8, 1986, outer plies of structural steel joints in unit 1 and unit 2 containment buildings and other safety-related buildings were found connected using A325 bolts in long slotted holes without the required plate washers or continuous bars being used to cover the slotted holes. Also, WBN-QCP-1.42-3, revision 5, did not fully implement the requirement of G-53.

This is a severity level IV violation (supplement II).

Admission or Denial of the Alleged Violation

TVA admits the violation occurred and wishes to provide the following clarification. The requirement in question was fully implemented by WBN-QCP-1.42-3, revision 5, in October of 1985 upon inclusion of the requirement in specification G-53. At that time approximately 90 percent of the work covered by this requirement was complete. The remaining work will be performed in accordance with revision 5 of QCP-1.42-3.

Reason for the Violation

The violation resulted from the failure to incorporate AISC code requirements into General Construction Specification G-53, "ASME Section III and non-ASME Section III, Bolting Material," WBN-QCP-1.42-3, "Structural and Miscellaneous Bolted Connections," MAI-9, "Bolting of Structural Steel and Electrical Connections," and DNE issued drawings, and when G-53 was corrected TVA failed to consider the impact on previously completed work.

Corrective Steps Taken and Results Achieved

NCRs 6835 (unit 2) and W-431-P (unit 1) were initiated to document this deficiency. TVA shall evaluate the requirement for the use of bar or plate washers over long slotted holes in the outer ply and determine which specific

connections require bar or plate washers and revise drawings accordingly. Any steel requiring the addition of bars or washers will be reworked as required.

Corrective Steps Taken to Avoid Further Violations

Future features will be installed according to AISC code requirements as now specified in G-53 and WBN-QCP-1.42-3. Modification and Additions Instruction MAI-9 is presently being revised to implement this requirement and is scheduled to be issued September 2, 1986. Applicable site personnel will be reinstructed to the requirements of MAI-9 and WBN-QCP-1.42-3 by October 1, 1986.

Date of Full Compliance

TVA will be in full compliance prior to fuel load of the respective units.

Violation 390/86-12-10; 391/86-13-10

10 CFR 50, Appendix B, Criterion XVI, as implemented by TVA's QA Topical Report TVA-TR-75-1A, revision 8, paragraphs 17.1.16 requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, during the period between June 25, 1980, through November 13, 1985, (five years, four months) a weld procedure was used on site with an incorrect interpass temperature specified that went undetected and uncorrected. After the deficiency was identified by the licensee, inadequate corrective actions were taken by the licensee to resolve the FSAR violation regarding interpass temperature controls and analyses were not done to determine the effects of elevated interpass temperatures on stainless steel weldments.

This is a Severity Level IV violation (Supplement II).

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

The violation is a result of inadequate development of the disposition to Nonconforming Condition Report (NCR) W-309-P. The disposition was liberal in nature and did not adequately address all aspects of the problem identified in the NCR.

Corrective Steps Taken and Results Achieved

The engineer who provided, and the manager who approved, the disposition of NCR W-309-P now recognize the inadequacies associated with the disposition. The disposition to NCR W-309-P will be revised to correct all deficiencies and will specifically address those deficiencies identified in the violation.

Corrective Steps Taken to Avoid Further Violations

We believe the violation to be an isolated case in which the responsible engineer and manager failed to fully and adequately address all aspects of the problem identified in the NCR. The engineer and manager have been made aware of the inadequacies associated with the NCR and are correcting the error. We believe that no further action is appropriate.

Date of Full Compliance

TVA will be in full compliance by September 12, 1986.