

U.S. Nuclear Regulatory Commission

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2
TVA RESPONSE TO VIOLATION 390, 391/88-01-01

REFERENCE: NRC Inspection Report Nos. 50-390/88-01 and 50-391/88-01 and
TVA's June 9, 1988 response

Violation 390, 391/88-01-01, "Failure to Follow Procedures"

10 CFR Part 50, Appendix B, Criterion V, as implemented by TVA's Quality Assurance (QA) Topical Report, TVA-TR75-1A, Rev. 9, Sections 17.1.5 and 17.2.5, "Instructions, Procedures, and Drawings", requires that activities affecting quality be accomplished in accordance with instructions, procedures, or drawings.

QA Topical Report Table 17E-1 states that the Nuclear Quality Assurance Manual (NQAM) delineates responsibilities, requirements, and commitments for the QA Program during design and construction.

NQAM, Part I, Section 2.16, Rev. 3, "Corrective Action", Paragraph 10.5, requires that these condition adverse to quality reports (CAQRs) classified as "potentially generic" be reviewed by the potentially affected organization within 70 calendar days from the origination date of the CAQR.

Contrary to the above, CAQRs SQP [SQN] 871347, SQP 871003, SQP 871066, SQP 871743, SQP [SQT] 871304, and BFP 871056 were classified as potentially affecting Watts Bar and did not receive generic review within 70 calendar days from the origination date of the CAQR.

This is a Severity Level IV violation (Supplement II) and applies to Units 1 and 2.

Supplemental Response - Corrective Steps Taken to Avoid Further Violation

The Nuclear Quality Assurance Manual (NQAM), Part I, section 2.16, revision 4, and Part I, section 2.16.4, revision 0 (including a quality notice), included changes to the CAQR program covered in the subject violation. These changes and how they relate to the NQAM, Part I, section 2.16, revision 3, are discussed below:

1. Failure to follow timeframes shall be evaluated on a trend basis to determine if an adverse trend associated with timeliness exists. If confirmed, a CAQR shall be initiated and processed. Revision 3 was not clear in addressing missed timeframes.

2. Within 10 days of receipt a review is performed to determine if CAQRs potentially affect other organizations. This review is performed by Nuclear Engineering-Engineering Assurance for CAQRs which have a Nuclear Engineering (NE) organization as the responsible organization or by Nuclear Licensing and Regulatory Affairs (NLRA) for CAQRs which have a responsible organization other than an NE organization. Revision 3, required the review within 40 days of the CAQR origination date.
3. Within 30 days of receipt, the CAQ coordinator shall forward a single coordinated response to NE-EA or NLRA. Revision 3 required the CAQ coordinator to respond within 70 days of the CAQR origination date.
4. When a generic review is late and not progressing satisfactorily, the CAQR shall be escalated. Revision 3 did not require escalation of late generic reviews.
5. The Senior Vice President of Nuclear Power or Vice President of Nuclear Quality Assurance (NQA) may grant changes to the timeframe requirements upon written request from the site director of a plant with a construction permit. Revision 3 did not make such a provision. The provision remains in the NQAM for the Vice President of NQA to waive the escalation process when holds or delays resulting from corporate-approved policy or changes in work scope occur.

The changes to the CAQR program will be implemented by September 1, 1988.

ENCLOSURE 2

LIST OF COMMITMENTS

The changes to the CAQR program will be implemented by September 1, 1988.