

TENNESSEE VALLEY AUTHORITY

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MAY 14 1990

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

In the Matter of the Application of)
Tennessee Valley Authority) Docket Nos. 50-390
50-391

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NOS. 50-390, 391/89-13 -
REVISED RESPONSE TO VIOLATION 390, 391/89-13-01, EXAMPLE 1

TVA's February 12, 1990 letter to NRC indicated that a revised response to Violation 390, 391/89-13-01, Example 1, would be provided by March 9, 1990. Enclosure 1 is TVA's revised response which supersedes the December 11, 1989 response to Example 1. Delays in submitting this response were discussed with Ken Barr on March 9, 1990, with Becky Long on April 13, 1990, and with Ken Barr on April 27 and May 3, 1990.

TVA's December 11, 1989 response stated that a review of TVA 575s between 1980 and present did not identify any additional problems with solder end use traceability for safety-related applications. As a matter of clarification, the review contained only TVA 575s issued between 1985 and 1989. The fact that this review did not include the earlier TVA 575s is not significant with regard to the issue of procedural noncompliance, because the procedure was not revised until March 1987, at which time the documentation of end use on the TVA 575 was first required for Unit 1. This procedure revision was an upgrade to enhance documentation of end use. End use documentation for electrical solder on Unit 2 was not required until December 1989, when the Unit 2 program was consolidated under Administrative Instruction (AI)-5.4.

The last report also indicated that solder used in electrical applications was not controlled by AI-9.4.1 prior to 1988. As a result of TVA's additional investigation into this violation, it was determined that for the Unit 1 program, solder issued to the toolroom had been controlled in accordance with AI-9.4.1. The violation was not an isolated case. Based on TVA's resolution of this issue, the 1988 date is no longer relevant.

Enclosure 2 identifies the commitment made in this submittal.

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Q FDC

U.S. Nuclear Regulatory Commission

MAY 14 1990

If there are any questions, please telephone G. R. Ashley at (615) 365-8527.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


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Enclosures

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT (WBN)
REVISED RESPONSE TO VIOLATION
390, 391/89-13-01, EXAMPLE 1

VIOLATION 390, 391/89-13-01

Description

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," requires in part that activities ". . . shall be accomplished in accordance with these instructions, procedures, and drawings."

1. Contrary to the above, in June 1989, the licensee released commercially purchased solder for use without documenting the end use of this material. Administrative Instruction (AI)-5.4, Revision 21, "Material Issue Transfer and Traceability," requires that form TVA 575 identify the initial applicable work control document and any subsequent work control documents for end use identification.

* * *

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

Admission or Denial of the Violation

TVA admits the violation occurred as stated.

Example 1:

Reason for the Violation

Power Stores personnel failed to comply with AI-5.4, in that solder was issued without end use documented on the TVA 575, because they assumed that control of solder under the welding program provided adequate traceability.

Procedures AI-5.4, "Material Issue, Transfer, and Traceability," and AI-9.4.1, "Welding Material Control," did not distinguish between solder used in electrical applications and solder used in other plant applications. As a result, there was confusion over which procedure controlled issuance of electrical solder.

Corrective Steps Taken and Results Achieved

Condition Adverse to Quality Report (CAQR) WBQ 890412 was initiated to document the fact that bulk quantities of the solder material had been issued without properly completing the storeroom requisition form (TVA 575) to designate the equipment where the solder material was to be utilized. The TVA 575 in question, No. A-077101, was updated to identify end use work control documents.

A representative sample of Power Stores TVA 575s from March of 1987 to March of 1990 was reviewed for compliance with AI-5.4 in the area of end use traceability. Of the 58 TVA 575s in the sample, two did not identify end use. The deficient TVA 575s involved welding rods and protective coatings. For both materials, TVA issues from the warehouse to another distribution center, with control programs from that point. Welding material documentation is controlled within the welding program. TVA 575s or contract numbers are required to be included in the work control document for protective coatings and other items.

Power Stores personnel have been trained on the use of TVA 575s for control of solder used in electrical applications. AI-5.4 has been revised to specifically include solder used in electrical applications as an item requiring reference to the initial work document on the TVA 575. Subsequent work documents reference the issue document. AI-9.4.1 has been revised to specifically exclude solder used in electrical applications from control under the welding material control program.

Corrective Steps Which Will Be Taken to Avoid Further Violation

AI-5.4 will be revised to exclude the requirement to list end use applications on the TVA 575 for materials (such as paint and welding material) issued to other distribution centers.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance by October 1, 1990, upon revision of AI-5.4.

ENCLOSURE 2

LIST OF COMMITMENTS

AI-5.4 will be revised to exclude the requirement to list end use applications on the TVA 575 for materials (such as paint and welding material) issued to other distribution centers.