

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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JUL 29 1987

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

Gentlemen:

WATTS BAR NUCLEAR PLANT (WBN) - UNITS 1 AND 2 - REGION II INSPECTION REPORT
WBRD-50-390/86-24, WBRD-50-391/86-24 - RESPONSE TO VIOLATIONS

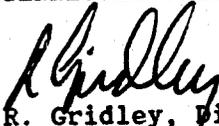
Enclosed is our revised response to violation 1, part 3 of NRC Inspection Report Nos. 50-390/86-24 and 50-391/86-24. Stewart D. Ebnetter's letter dated June 29, 1987 to S. A. White maintained that WBN was in violation of NRC regulations as stated in Notice of Violation, violation 1, part 3, and the WBN denial, after careful consideration, was disallowed. We have reexamined the issue and admit to the violation.

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

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Director
Nuclear Safety and Licensing

Enclosure

cc: See page 2

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JUL 29 1987

U.S. Nuclear Regulatory Commission

cc (Enclosure):

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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO NRC REGION II LETTER
FROM STEWART D. EBNETER TO S. A. WHITE DATED JUNE 29, 1987

REVISED REPORT

REFERENCE: REPORT NOS. 390, 391/86-24-01, VIOLATION 1, PART 3.

This revised report responds to the Notice of Violation, violation 1, part 3, 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, 391/86-24-01

10 CFR 50, Appendix B, Criterion V, "Inspection, Procedures, and Drawings," as implemented by TVA's QA Topical Report, TVA-TR75-1A, Revision 8, Section 17.1.5, requires that activities affecting quality shall be accomplished in accordance with instructions, procedures, and drawings.

TVA's QA Topical Report, paragraph 17-1.16.2, as implemented by Quality Control Instructions (QCI) 1.02, Revision 15, "Control of Nonconforming Items," requires conditions adverse to quality (CAQs) be documented as nonconforming conditions reports (NCRs).

3. Contrary to the above, during a routine inspection on October 10, 1986, the inspector determined that CAQs, a broken torque switch in valve operator 2-FCV-3-179B-B, and a broken terminal block in valve operator 2-FCV-3-116B-A were found while performing activities in accordance with work package FA003RZ (replacement of wire in class 1E Limitorque valve operators). These CAQs were identified and replaced by revisions to the workplan instead of documenting the deficiencies as NCRs.

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

Violation 1, Part 3 - Broken Parts Replaced Under a Workplan

1. Admission or Denial of the Alleged Violation (or Finding)

TVA admits the violation.

2. Reasons For the Violation (or Findings) If Admitted

QCI-.02, Revision 15, "Control of Nonconforming Items," reduced the scope of the QA Topical Report paragraph 17-1.16.2 in that only problems found after final quality control acceptance at the site were required to be identified on nonconformance reports.

3. Corrective Steps Which Have Been Taken and Results Achieved

WBN QCI 1.60 "Work Control" has been revised to require identification and correction of deficiencies found during installation and to ensure that documentation of such is part of the permanent records.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations (or Findings)

TVA agrees with the NRC staff position "that deficiencies (such as broken parts) found or caused within equipment previously accepted or qualified to specified standards (e.g., Class 1E) at the installation site or equipment manufacturer must be documented, corrected, and evaluated for trending and continued acceptance or qualification to original design standards."

Nuclear Quality Assurance Manual (NQAM), part I, section 2.16, "Quality Notice - Corrective Action" is the Office of Nuclear Power's (ONP) standardized procedure for identification of CAQs. (WBN CEP 1.02, "Corrective Action," which implements NQAM, part I, section 2.16; replaced WBN QCI-.02, "Control of Nonconforming Items.")

The NQAM will be revised to clearly delineate which types of in-process deficiencies may be corrected with a work control document and which require more formal handling in accordance with the corrective action program.

TVA is considering a definition of in-process deficiencies which will be limited to conditions which meet the following:

1. Conditions which are within the scope of the work control document being implemented, and
2. The condition relates to items or activities that have not yet been inspected and accepted, and
3. The applicable work control document makes provision for the final inspection of the affected items or activities such that any corrective measures will be fully verified, and
4. The condition is to be corrected to fully meet original requirements using the original procedure, and
5. The condition resulted from craftsman error and not from material failure, incorrect procedure requirements, unqualified tools, or other causes not under the direct control of the craftsman.

If identified by QC inspectors as violating specific inspection acceptance criteria at an inspection holdpoint, the above conditions will be recorded on an Inspection Notice or In-process Rejection Notice and included in a trending program.

Routine maintenance failures, due to wear and tear or due to reaching the end of a components normal life cycle, will be handled by maintenance requests on transferred equipment and workplans for other equipment.

The broken torque switch and broken terminal block cited in the violation will be evaluated through the CAQR system.

All other deficiencies or adverse trends in in-process deficiencies will be documented as CAQRs and processed in accordance with NQAM, part I, section 2.16.

5. Date When Full Compliance Will Be Achieved

The revised NQAM, part I, section 2.16 for in-process deficiencies will be submitted to the NRC by September 15, 1987.

WBN QCI 1.60 "Work Control" will be revised to stipulate that in-process deficiencies will be documented, corrected as necessary, and trended for the purpose of identifying significant conditions which may require additional corrective actions to prevent repetition by November 15, 1987. These actions will ensure compliance with the QA Topical Report.