

**TENNESSEE VALLEY AUTHORITY**

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

**AUG 24 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  
NOS. 50-390/87-03 AND 50-391/87-03 - RESPONSE TO VIOLATIONS

Enclosed is our response to G. G. Zech's letter dated July 27, 1987, to  
S. A. White regarding Inspection Report Nos: 50-390/87-03 and 50-391/87-03,  
requesting clarification and additional information for examples 1 and 2 of  
the violation. Enclosed is our response to violation 391/87-03-03 parts 1  
and 2.

If there are any questions, please telephone R. D. Schulz at (615) 365-8524.

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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AUG 24 1987

U.S. Nuclear Regulatory Commission

cc (Enclosure):

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U.S. Nuclear Regulatory Commission  
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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
RESPONSE TO NRC REGION II LETTER  
FROM GARY G. ZECH DATED JULY 27, 1987, TO S. A. WHITE  
NOS. 50-390/87-03 AND 50-391/87-03

This report is in response to the request for additional information detailed in NRC's July 27, 1987 letter, subject matter NRC Inspection Report Nos. 50-390/87-03 and 50-391/87-03. This is our final report on the clarification of these items of noncompliance.

NRC Request

1. In reference to example 1 of Violation 391/87-03-03, your response does not appear to address deficiency reports, rather it addresses the individual item referenced on the deficiency report, i.e., the reactor pressure vessel. Please address your corrective actions that will prevent deficiency reports and the affected item from remaining uncorrected for extended periods of time, such as occurred in the example of the reactor pressure vessel cited in the Notice of Violation.
2. In reference to example 2 of the Violation, which described the inadequate disposition of items turned over to the operations staff, we note you have now established procedure requirements that require notification of the operations staff of deficiencies discovered on equipment turned over to operations. However, your response only discusses a notification of operations and fails to describe the operations staff program that will properly correct the deficiency. Therefore, we request you provide this additional information for staff review.

TVA Response

1. TVA will perform a review of Deficiency Reports (DRs) to determine if any generic conditions exist. The sample will be based on the statistical and results evaluation methodology used in Nuclear Construction Issues Group NCIG-02, entitled "Sampling Plan for Visual Reinspection of Welds." The attributes to be used for the review are:
  1. DRs dispositioned with inadequate corrective action.
  2. DRs dispositioned with untimely corrective action.

Condition adverse to quality reports will be written to ensure appropriate corrective action(s) to resolve problems identified. If this evaluation reveals a generic problem, the size of the sample will be increased to determine the extent of the discrepancy. The initial sample evaluation will be completed and results reviewed by December 18, 1987. If sample size expansion is required, a supplemental response will be provided to identify the schedule for completing the review.

To preclude recurrence, WBN CEP 1.52 will require DRs to be closed within 30 days after initiation. This will ensure that items do not remain in a detrimental situation for an indeterminate period of time. Additionally, the Quality Surveillance Section will perform surveillances to ensure conformance with program requirements.

WBN CEP 1.52 will be issued by October 15, 1987.

2. Procedure WBN CEP 1.52, "Preventive Maintenance," will require that DRs written on equipment that has been transferred to operations be closed in this method:
  1. The Engineering Surveillance Group supervisor will have a Maintenance Request (MR) written.
  2. The MR number will be entered on the DR, a copy of the MR attached to the DR and the DR will be closed based on issuance of the MR.
  3. The MR will then be forwarded to the site director for processing per AI 9.2, "Maintenance Requests and Preventive Maintenance."

WBN CEP 1.52 will be issued by October 15, 1987.