

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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OCT 16 1987

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USNRC-DS

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2 - REGION II INSPECTION REPORT  
NOS. 50-390/87-12 AND 50-391/87-12 - RESPONSE TO NOTICE OF VIOLATION

Enclosed is our response to G. G. Zech's letter dated September 16, 1987, to  
S. A. White, which transmitted the subject inspection report, citing  
activities at WBN that were in violation of NRC regulations. The response  
addresses violation 390/87-12-01.

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*  
R. Gridley, Director  
Nuclear Licensing and  
Regulatory Affairs

Enclosure  
cc: See page 2

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U.S. Nuclear Regulatory Commission

OCT 16 1987

cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2  
RESPONSE TO NRC REGION II LETTER  
FROM GARY G. ZECH TO S. A. WHITE DATED SEPTEMBER 16, 1987  
INSPECTION REPORT NOS. 50-390/87-12 AND 50-391/87-12

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 390/87-12-01

10 CFR 50, Appendix B, Criteria V, as implemented by TVA's Quality Assurance (QA) Topical Report, TVA-TR75-1A, Rev. 9, paragraphs 17.1.5 and 17.2.5, requires that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions. Site Administrative Instruction (AI) 2.15, "Temporary Alterations," Revision 15, requires that temporary alterations to both critical structures, systems and components (CSSC) and non-CSSC equipment be documented and controlled.

1. Contrary to the above, Technical Instruction 51.17, Rev. 0, "Recommended Preservation Techniques and Sampling/Inspection Frequencies," does not give sufficient detailed information to assure that layup and preservation of systems and equipment will be adequate. As an example of this deficiency, the auxiliary feedwater pumps were reported as having been drained with layup completed. An inspection of the pumps on unit 1 showed that water still remained in flow balancing piping, mini-flow lines, and portions of the instrument lines, which is an inadequate layup condition.
2. Contrary to the above, activities affecting quality were not accomplished in accordance with appropriate instructions (AI-2.15) in that the electrical wiring for three dehumidifiers was connected to 480 volt Turbine Motor Operated Valve (MOV) Board 1B and had been neither tagged nor identified as a temporary alteration.

This is a Severity Level IV violation (Supplement 11) and affects unit 1 only.

Admission or Denial of the Alleged Violation, Item 1

TVA admits the violation occurred as stated.

Reason for the Violation, Item 1

Plant layup instruction, TI-51.17, was not fully implemented in that no low-point drains were checked for retained water. TI-51.17 lacked sufficient step-by-step instructions to require specific low-point drains to be routinely checked to ensure that the Auxiliary Feedwater System was verified to be in dry layup. TI-51.17 also lacked sufficient details to ensure all plant systems would be in a required layup condition.

Corrective Actions Taken and Results Achieved, Item 1

TI-51.17 is being carefully implemented and augmented by interim revisions. Additional manpower has been assigned to implement the layup program and Maintenance Requests (MRs) and Temporary Alterations have also been used to augment TI-51.17.

Corrective Actions Taken to Avoid Further Violations, Item 1

A series of detailed instructions is being written by an experienced staff composed of various plant disciplines under a layup coordinator. This staff is actively pursuing the implementation of the detailed instructions, including instructions for the Auxiliary Feedwater System.

Date When Full Compliance will be Achieved, Item 1

The preparation of the detailed instructions is scheduled to be completed by December 15, 1987. Implementation of the instructions will be completed by March 31, 1988.

Admission or Denial of the Alleged Violation, Item 2

TVA admits the violation occurred as stated.

Reasons for the Violation, Item 2

An investigation into the violation could not ascertain why documented records of the installation of the three temporary alterations did not exist. An investigation of MRs on the system could not determine when the dehumidifiers were installed. The three installed dehumidifiers were not documented in accordance with procedure AI 2.15, "Temporary Alteration," and would appear to be caused by inadequate training in the implementation of AI 2.15.

Corrective Actions Taken and Results Achieved, Item 2

A CAQR, WBN 870598, was issued by Electrical Maintenance to document the missing Temporary Alteration Control Forms (TACF). An MR was written to install TACF tags on the cables. MR A503236 installed the tags on June 29, 1987, under Temporary Alteration No. 1-87-26-209.

Corrective Action Taken to Avoid Further Violation, Item 2

A training program shall be conducted and documented for electrical maintenance planners, craft foremen, and general foremen concerning Temporary Alterations requirements contained in AI-2.15. Scheduled completion for this training is February 29, 1988.

Date When Full Compliance will be Achieved, Item 2

TVA will be in full compliance on February 29, 1988.