

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
5N 157B Lookout Place

FEB 26 1988

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. 50-390/86-20 AND 50-391/86-20 - REVISED NOTICE OF VIOLATION
RESPONSE

Enclosed is our updated response to the subject Notice of Violation that provides information specific to WBN. Please note that this response does not address your related request for information concerning the initial test program for WBN unit 1 dated February 3, 1988. TVA will respond to that request independently of the violation by May 3, 1988.

The delay in submittal of this response until February 29, 1988, was discussed with Stephen Elrod, Region II, on February 9, 1988.

Updated information and the final action plan on the TVA Corporate concerns relating to this violation will be sent to you by March 31, 1988. This submittal date was discussed with Gordon Hunegs, Region II, on February 26, 1988.

If there are any questions, please telephone C. J. Riedl at (615) 365-8524.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission

FEB 26 1988

cc (Enclosure):

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**WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2
REPORT NUMBERS 50-390/86-20 AND 50-391/86-20
CORRECTED NOTICE OF VIOLATION
UPDATED RESPONSE**

This is an updated response to the Notice of Violation described in enclosure 1 of the NRC Region II inspection report referenced above.

Violation 390/86-20-01

"10 CFR 50, Appendix B, Criterion V as implemented by TVA's QA Topical Report, TVA-TR-75-1A, Rev. 8 paragraph 17.2.5 requires that activities affecting quality be prescribed by approved procedures of a type appropriate to the circumstance and shall be accomplished in accordance with these procedures. Paragraph 17.2.5 further implements this requirement by requiring preoperational test instructions affecting safety-related functions of CSSC (Critical Structures, Systems and Components) be reviewed by the Plant Operation Review Committee or a special test committee (including the plant Quality Assurance Staff and Office of Engineering) for inclusion of appropriate acceptance criteria and technical adequacy. Paragraph 17.2.11 requires that test instructions are --- reviewed by qualified personnel including the plant QA staff and approved by the plant manager. ANCI N18.7, 1976, Section 5.2.15 'Review, Approval and Control of Procedures' requires review and approval prior to initial use and that changes be reviewed and approved by the same organizations that performed the original review. Section 5.2.5 'Temporary Procedures' requires review and approval of temporary procedures in accordance with Section 5.2.15.

Contrary to the above, because the licensee failed to implement the above requirements in Administrative Procedure (A.I.) 6.2, when test addenda were constructed from previously-approved test procedures, the addenda did not receive Plant Operations Review Committee or Preoperational Test Committee approval. The addenda changed the scope, technique or sequential order of the original test.

This is a Severity Level IV violation (Supplement III), and applies to Unit 1."

Actions Taken

1. Instruction changes to WBN Administrative Instructions (AI) 3.1 and 6.2 were issued on or before December 11, 1987. These changes incorporated the following nonintent definitions:
 - A. Typographical errors that do NOT affect acceptance criteria or numbers (that is, page numbers, revision numbers);
 - B. Changes to valve lineups, or unique identifiers on non-safety-related systems.
 - C. The partial use of a procedure or instruction for completing the testing of a subtrain or subcomponent provided the test is conducted with no effect on the remaining equipment.

2. WBN AI-3.1, revision 19, was issued on January 15, 1988, to incorporate the instruction change concerning nonintent.

Actions Still To Be Taken

The issuance of WBN AI-6.2 is scheduled to be issued on or before April 15, 1988, to include the nonintent definition.

Date When Full Compliance Will be Achieved

WBN will be in full compliance by April 15, 1988, on issuance of AI-6.2.