

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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APR 05 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

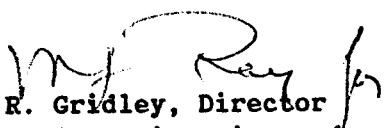
Enclosed is our updated information and the final action plan on the TVA
programmatic Corporate concerns relating to the subject violation. This
information is contained in enclosure 1. Enclosure 2 provides a summary of
commitments remaining from enclosure 1. The WBN specific information relative
to this violation was sent to NRC earlier by my letter dated February 26, 1988.

The delay in submittal of the Corporate response was discussed with
Gordon Hunegs, Region II, on February 26 and March 31, 1988.

If there are any questions, please telephone F. L. Ginn at (615) 751-7667.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

Enclosures
cc: See page 2

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U.S. Nuclear Regulatory Commission

APR 05 1988

cc (Enclosures):

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ENCLOSURE 1

THE ACTION PLAN FOR CORPORATE GUIDANCE
FOR IMPLEMENTATION OF QUALITY ASSURANCE (QA) PROGRAM REQUIREMENTS
IN THE CONTROL OF PROCEDURE AND INSTRUCTION CHANGES

TVA has finalized and updated the draft action plan described in our November 25, 1987 response. This updated action plan addresses the three Corporate commitments identified in enclosure 3 of the TVA response from R. L. Gridley to NRC dated November 25, 1987, concerning the revised Notice of Violation for Watts Bar Nuclear Plant (WBN) Units 1 and 2, Report Nos. 50-390/86-20 and 50-391/86-20.

Commitment 1 - "TVA's Division of Nuclear Quality Assurance will develop interim requirements ensuring that future alterations of the Quality Assurance program are coordinated in a thorough manner by February 15, 1988."

Specific TVA Programmatic Actions for Commitment 1

TVA's Division of Nuclear Quality Assurance (DNQA) has developed interim requirements to ensure that future changes to the QA program are coordinated in a thorough manner with the Office of Nuclear Power (ONP) sites, divisions, and staffs. These will establish a feedback process to convey to the sites, divisions, and staffs what constitutes proper implementation of QA program requirements in their instructions. This coordination will identify the need for additional training and/or explanation of intended program changes before implementation. These requirements will be implemented in the DNQA "Quality Methods Manual" by April 15, 1988.

Commitment 2 - "Provide an updated response on the completed evaluation of the adequacy of the current Office of Nuclear Power (ONP) Procedures system and implementation in onsite instructions related to test control and provide final near-term corrective actions needed by February 15, 1988."

Commitment 3 - "Provide an updated response on the completed evaluation of the adequacy of the current ONP procedure system and its implementation in onsite instructions relating to the procedure change control issue and provide final planned near-term actions by February 15, 1988."

Specific TVA Programmatic Actions for Commitments 2 and 3

TVA's DNQA evaluation of the adequacy of the current ONP procedure system and its implementation in the onsite instructions, relating to the intent/nonintent requirements of American National Standards Institute (ANSI) N18.7-1976 and the control of changes to test instructions, has been completed.

The results of the DNQA evaluation indicate that the following problems exist in the current ONP procedure system and its implementation in onsite instructions:

- Inconsistencies in change control requirements exist among TVA program-level procedures.
- TVA program-level procedures do not specify proper review and approval requirements of ANSI N18.7 for nonintent changes.
- Evidence exists that the flexibility that is permitted by the current TVA nuclear QA program for determining whether a proposed nonintent change affects the intent of a procedure has been misused in its implementation.

To address these inadequacies and promote greater consistency in TVA's implementation of procedure change control, TVA will implement by March 31, 1988, the following actions:

- TVA will revise the nuclear QA program to ensure that the current ONP procedure system is based on consistent requirements that fully implement the change control commitments contained in the TVA QA Topical Report (TVA-TR75-1A). Revisions to the "Nuclear Quality Assurance Manual" (NQAM) will consolidate the various Corporate document control requirements for the control of changes to procedures and instructions into Part I, sections 2.5 (Instructions, Procedures, and Drawings) and 2.6 (Document Control), of the NQAM (reference attachment 1).
- The deficiency in the program related to the ANSI N18.7 requirements for review and approval of nonintent changes is being addressed and corrected by Condition Adverse to Quality Report CHS-880004. The NQAM will be revised to specify proper review and approval requirements of ANSI N18.7 for nonintent changes.
- The criteria contained in the NQAM for determining which changes affect the intent of a preoperational test instruction will be revised to provide the necessary administrative controls for nonintent changes to preoperational test instructions and prevent the misapplication of the nonintent change process. This revision will consolidate the various Corporate document control requirements to control changes and will ensure that future nonintent changes to preoperational test instructions will be accomplished in the same manner as a nonintent change to any operating phase instruction.

The sites will ensure full compliance with the revised NQAM requirements by May 28, 1988.

ATTACHMENT 1

The QA control elements contained in the requirements sections of NQAM, Part I, sections 2.5 and 2.6 and part III, section 1.1, will be revised by March 31, 1988, to provide:

- Clarification of the applicability of ANSI N18.7 versus ANSI N45.2 relative to activities during the construction-to-operations turnover phase of the project.
- Specific requirements to ensure that appropriate review and approval of documents are accomplished before use.
- Identification of the individuals or organizations responsible for preparing, reviewing, approving, and issuing documents and revisions thereto.
- Specific requirements identifying which members of the plant staff must approve nonintent changes.
- Clear assignment of responsibility to site management to ensure that nonintent change criteria are appropriately applied.
- Criteria to ensure that all changes will be handled in a consistent manner whether they are intent or nonintent. It will state the following:
 1. An intent change is one that does any of the following:
 - a. Changes to plant's procedures and instructions acceptance criteria.
 - b. Deletion or alteration of Quality Control (QC) holdpoints--instruction changes affecting QC holdpoints may be handled as nonintent if documented concurrence is obtained from the Site Quality Manager before implementing the change. Addition of new holdpoints does not constitute an intent change.
 - c. Changes to procedures and instructions that would violate the technical specifications or other licensing requirements.
 - d. Changes in scope, technique, or sequential order of procedure and instruction steps that would affect the result or nuclear safety.

- e. Changes that implement a temporary alteration to operable critical systems, structures, and components without a temporary alteration control form.
 - f. Changes to either the authority or responsibility for review and/or approval of the document or the results obtained by its implementation.
2. Nonintentional changes to an operational phase document, such as inconsequential editorial corrections, will not receive the same review and approval as the original document. The nuclear site director will be responsible for ensuring that the type of nonintentional changes that do not require such a review and approval are clearly delineated in approved plant instructions. These changes will be made by a site method that complies with QA program requirements.

ENCLOSURE 2

SUMMARY OF COMMITMENTS

- TVA will revise the nuclear QA program by March 31, 1988, to ensure that the current ONP procedure system is based on a consistent set of requirements that fully implements the change control commitments contained in the TVA QA Topical Report (TVA-TR75-1A). Specifically, NQAM, Part I, sections 2.5 and 2.6, will be revised. The revisions to the NQAM will consolidate the various Corporate document control requirements for the control of changes to procedures and instructions into NQAM, Part I, sections 2.5 and 2.6.
- The NQAM will be revised by March 31, 1988, to specify proper review and approval requirements of ANSI N18.7 for nonintent changes.
- The criteria contained in the NQAM for determining which changes affect the intent of a preoperational test instruction will be revised by March 31, 1988, to provide the necessary administrative controls for nonintent changes to these instructions, prevent the misapplication of the nonintent change process, and ensure that future nonintent changes to these instructions will be accomplished in the same manner as a nonintent change to any operating phase instruction.
- TVA will revise the DNQA "Quality Methods Manual" by April 15, 1988, to include interim requirements that ensure that future changes to the QA program are coordinated in a thorough manner with the ONP sites, divisions, and staffs.
- The sites will ensure full compliance with the revised NQAM requirements by May 28, 1988.