

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

AUG 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) - REGION II INSPECTION REPORT NOS. 50-390/88-03
AND 50-391/88-03 - REPLY TO NOTICE OF DEVIATION 390, 391/88-03-02, FAILURE TO
IMPLEMENT COMMITMENTS MADE IN A VIOLATION RESPONSE (390/86-25-07 AND
391/86-25-05)

Enclosed is our response to Frank R. McCoy's letter dated July 7, 1988, to
S. A. White, which transmitted the subject inspection report, citing
activities at WBN that appear to be a deviation from WBN's commitments made in
violation response 390/86-25-07 and 391/86-25-05. Enclosure 1 is our response
to the notice of deviation. Enclosure 2 contains a list of commitments made
by TVA in the response.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Manager
Nuclear Licensing and
Regulatory Affairs

Enclosures
cc: See page 2

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U.S. Nuclear Regulatory Commission

AUG 05 1988

cc (Enclosures):

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2
TVA'S RESPONSE TO DEVIATION 390, 391/88-03-02

REFERENCE: NRC Inspection Report Nos. 50-390788-03 and 50-391/88-03

Deviation 390, 391/88-03-02

The following deviation was identified during a Nuclear Regulatory Commission (NRC) inspection conducted from May 10 - June 13, 1988.

The licensee informed the NRC, in a March 6, 1987 response to a Notice of Violation issued February 4, 1987, that the new Condition Adverse to Quality Report (CAQR) program would require reevaluation of significance determination after inspections were performed or after the corrective action had been determined or revised. It was also stated that the new CAQR program would be implemented by March 30, 1987.

Contrary to the above, the CAQR program had not been implemented as described above at the time of this inspection.

Reason for Deviation

TVA believed that the intent of the violation response was met by Administrative Instruction (AI)-2.8.5, section 6.4.1.A, Note, which states:

"The Responsible Organization SHALL UPGRADE to significant any CAQR at any time when evidence is obtained which indicates that the CAQ represents a significant condition. Any other organization obtaining evidence which affects the significance determination SHALL NOTIFY the Responsible Organization".

However, TVA did not systematically ensure that the procedure accurately implemented the commitment.

Corrective Steps and Results Achieved

TVA will submit a revised final response to violations 390/86-25-07 and 391/86-25-05 to clarify the intent of the commitment for reevaluating significance determinations.

Corrective Steps to Avoid Further Deviation

AI-1.20, "Commitment Management," was issued May 17, 1988, as a Site Director Procedure to enhance our existing commitment management program at WBN in the areas of lead coordinator responsibilities and commitment verification. The purpose of this AI is to define the process and controls used at WBN to establish, implement, maintain, and monitor all NRC commitments.

AI-1.20, section 5.5, requires a "lead coordinator" to be responsible for coordinating the development of action plans to implement commitments, tracking progress toward completion, and reviewing commitment completion. This should ensure that commitments are met and verified.

ENCLOSURE 2

LIST OF COMMITMENTS

TVA will submit a revised final response to violations 390/86-25-07 and 391/86-25-05 to clarify the intent of the commitment for reevaluating significance determinations.