

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

6N 38A Lookout Place

JUL 28 1989

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

Gentlemen:

In the Matter of the Application of)
Tennessee Valley Authority)

Docket Nos. 50-390
50-391

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NOS. 50-390/87-07 AND
50-391/87-07 - SUPPLEMENTAL FINAL RESPONSE TO VIOLATION 390/87-07-01

Enclosed is a supplemental final response to G. G. Zech's letter dated June 5, 1987, to S. A. White, which transmitted the subject inspection report, citing activities at WBN that appear to be in violation of NRC regulations. Enclosure 1 is our supplemental response to the notice of violation 50-390/87-07-01. The supplement contains additional information which augments and clarifies the relativity of the conduit support corrective action plan to this violation. TVA will submit a response to the corrective actions required for Unit 2, violation 50-391/87-07-01, after a schedule for Unit 2 activities is established.

TVA submitted a response admitting the violation on July 6, 1987, and a final response for Unit 1 on March 30, 1989. Enclosure 1 is a supplement to our final report on the subject inspection for Unit 1. Enclosure 2 contains the commitment made in this report.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY



Mark O. Medford, Vice President
and Nuclear Technical Director

Enclosures
cc: See page 2

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JUL 28 1989

U.S. Nuclear Regulatory Commission

cc (Enclosures):

Ms. S. C. Black, Assistant Director
for Projects
TVA Projects Division
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. B. A. Wilson, Assistant Director
for Inspection Programs
TVA Projects Division
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

NRC Resident Inspector
Watts Bar Nuclear Plant
P.O. Box 700
Spring City, Tennessee 37381

ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1
RESPONSE TO NUCLEAR REGULATORY COMMISSION'S (NRC) LETTER
FROM GARY G. ZECH TO S. A. WHITE DATED JUNE 5, 1987
REPORT NO. 50-390/87-07-01

This report provides supplemental information to TVA's final response to the notice of violation described in NRC's inspection report referenced above.

Corrective Steps Which Have Been Taken and Results Achieved (Supplemental Information)

The objective of the corrective action program (CAP) plan for conduit supports is to assure that the WBN safety-related [Category I and I(L)] conduits and conduit supports are structurally adequate and in compliance with licensing requirements and design criteria. To accomplish this, TVA will:

- complete and document the design basis;
- update the design output documents;
- revise construction, maintenance, and quality assurance (QA) procedures to incorporate design output requirements; and
- develop and implement a critical case evaluation of existing installations with corrective actions as appropriate. The number of critical cases to be evaluated will depend on the assessment of walkthrough data.

These statements are provided as summaries of the CAP plan for conduit supports and are discussed in more detail in section 4.1 of the CAP plan. (These actions are the same as those being taken to resolve heating, ventilating, and air conditioning [HVAC] support issues.)

Condition Adverse to Quality Report (CAQR) WBN 870316 documents the conduit support deficiency (2-inch tube steel conduit support attached to HVAC support 0031-DW930-044-1093 for which a variance could not be located) identified in this violation.

Corrective Steps Which Will Be Taken to Avoid Further Violation (Supplemental Information)

Recurrence control is discussed in section 4.2 of the Conduit Support CAP Plan. The actions involving issuance of the engineering requirements (ER) specifications and revision of implementing procedures, with training thereto, are the pertinent recurrence control actions relating to this violation. These actions, which include training of construction, maintenance, and QA personnel, will provide increased attention to installation tolerances during erection, maintenance, and quality control (QC) inspection and will enhance compliance with configuration requirements.

The ER specification, ERS-WBN-CEB-008A, "Conduit and Conduit Support Installations," revision 0, was issued with an effective date of May 26, 1989. Section 4.1.2.28 of the specification discusses the requirements for obtaining engineering approval before attaching conduit supports to structural features and other series typicals.

Date of Full Compliance
(Supplemental Information)

TVA will complete the corrective actions as appropriate for the Conduit Support CAP Plan by May 26, 1990. These corrective actions identified in the Conduit Support CAP Plan are reiterated above for clarification of the violation response.

Attachments 2 and 3 of the conduit CAP plan provide a flowchart and fragnet, respectively, for the associated actions.

ENCLOSURE 2

LIST OF COMMITMENTS

TVA will complete the corrective actions as appropriate for the Conduit Support CAP Plan by May 26, 1990.