

TENNESSEE VALLEY AUTHORITY

CHATANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

25 JUN 4 9 56

May 29, 1985

U.S. Nuclear Regulatory Commission
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Washington, D.C. 20555

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - REVISED RESPONSE TO VIOLATION
50-390/85-02-01 - ACCEPTANCE OF A HANGER WHICH DID NOT COMPLY WITH SPECIFICATION
REQUIREMENTS

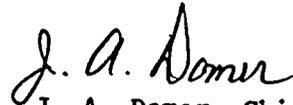
This is in response to R. D. Walker's letter dated April 30, 1985 report number
50-390/85-02 concerning TVA's initial response dated March 20, 1985 to NRC
notice of violation issued February 15, 1985 regarding activities conducted at
the Watts Bar Nuclear Plant. Enclosed is our revised response to violation
390/85-02-01.

If you have any questions concerning this matter, please get in touch with
R. H. Shell at FTS 858-2688

To the best of my knowledge, I declare the statements contained herein are
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



J. A. Domer, Chief
Nuclear Licensing Branch

Enclosure

cc (Enclosure):

Mr. James Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
REVISED RESPONSE TO SEVERITY LEVEL V VIOLATION
50-390/85-02-01
ACCEPTANCE OF A HANGER WHICH DID NOT COMPLY
WITH SPECIFICATION REQUIREMENTS

Description of Deficiency

10 CFR 50, Appendix B, Criteria V, requires activities affecting quality to be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. The licensee's accepted quality assurance (QA) program (TVA-TR75-1A), table 17D-2, endorses Regulatory Guide 1.28 and ANSI-N45.1-1971, quality assurance program requirements for nuclear power plants. Paragraph 6 of this standard and the licensee's implementing drawing 47A050-1Q1 R0, note 52, requires attachments to be on the centerline of plates within $\pm 1/2$ -inch except as noted.

Contrary to the above, the angle iron attachments shown on drawing 47A492-5-3 R2 were required to be installed within $\pm 1/2$ -inch of the $5-5/16$ inch dimension from the edge of the plate. The angles were actually installed $4-1/8$ inches below the top edge of the plate. This hanger had been previously accepted by a quality control inspector.

This is a Severity Level V violation (Supplement II).

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

This violation occurred as a result of the failure to follow Watts Bar Nuclear Plant quality control procedure WBNP QCP-4.23-8, "Support Final Inspection," in that support 1026-A492-5-3 was accepted without ensuring the correct dimensions as specified on the drawings.

TVA's investigation into this concern indicates that this is an isolated occurrence of a failure on the part of the craftsman to accurately construct the support and a failure on the part of the inspector to rigorously follow procedure WBNP-QCP-4.23-8, "Support Final Inspection" in that he accepted support 1026-A492-5-3 with the angle iron attachment mounted $11/16$ of an inch outside of the specified tolerance. The root cause of this violation is attributed to human error.

3. Corrective Steps Taken and Results Achieved

The angle iron attachment has been evaluated and is acceptable as mounted with the addition of four stiffer plates. Field Change Request (FCR) H-12985 has been processed and approved by TVA's Office of Engineering. This FCR revises drawing 47A492-5-3 R2 to reflect the installed configuration.

TVA has identified the craftsman and the inspector who performed the incorrect installation and the improper verification cited. Ten hangers installed by the craftsman and ten hangers inspected by the inspector were randomly selected and reinspected. The identification numbers of the sample hangers are listed below:

<u>Inspector</u>	<u>Craftsman</u>
1. 1070-1CC-R292	1070-70-1CC-R278
2. 1070-1CC-R300	1070-70-1CC-R281
3. 1068-1-68-291	1068-1-68-293
4. 1068-1-68-285	1068-1-68-290
5. 1068-1-68-208	1068-1-68-289
6. 2063-63-2515-R138	1068-1-68-288
7. 2063-63-2515-R137	1068-1-68-287
8. 1026-A491-40-16	1068-1-68-282
9. 0026-A491-60-90	1003A-1-03A-381
10. 0026-A491-60-49	1003A-1-03A-487

Reinspection of the listed hangers identified no discrepancies in craftsmanship or quality control inspection. The inspector is no longer employed at this site, he was terminated due to a reduction-in-force in August 1984. The craft foreman is presently employed in the instrumentation area.

4. Corrective Steps Taken to Avoid Further Violation

Hanger quality control inspectors have been reinstructed in the acceptance criteria of QCP 4.23-8, "Support Final Inspection," and other applicable procedures and specifications. This instruction, emphasizing ensuring accuracy while performing final inspections, was given February 26, 1985.

The craft manager was interviewed concerning his responsibilities for implementation of QA requirements when installing supports. Measures employed by him to address this area on a continuing basis include biweekly QA training for craftsmen on quality control procedures, construction specifications, design drawings and other procedures and ensuring access to copies of procedures and drawings. This training places particular emphasis on the 47A050 series drawing notes.

The quality control manager is experienced and is cognizant of his responsibilities in this area and meets weekly with craft management to discuss Inspection Rejection Notices written on hangers for the previous week. In these meetings, discussions are held as to why hangers are rejected, how to prevent rejections, and what causes rejections. This program was initiated approximately three months ago and has resulted in improved communications between craft, engineering, and quality control.

Our overall assessment of this program and the activities of managers in ensuring implementation of the program show that continuing emphasis is applied to maintain compliance and both craft and QC management fully understand their responsibilities.