

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

June 24, 1985

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U.S. Nuclear Regulatory Commission
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNIT 1 - RESPONSE TO VIOLATION 390/85-32-02 - FAILURE TO TAKE ADEQUATE CORRECTIVE ACTIONS WITH REGARD TO RESOLVING DEFICIENT PLANT PROCEDURES

This is in response to R. D. Walker's letter dated May 24, 1985, report number 390/85-32 concerning activities at the Watts Bar Nuclear Plant which appeared to have been in violation of NRC regulations. Enclosed is our response to the citation.

If you have any questions, 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

J. A. Domer, Chief
Nuclear Licensing Branch

Enclosure

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

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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNIT 1
RESPONSE TO SEVERITY LEVEL IV VIOLATION
390/85-32-02
FAILURE TO TAKE ADEQUATE CORRECTIVE ACTIONS
WITH REGARD TO RESOLVING DEFICIENT PLANT PROCEDURES

Description of Violation

10 CFR 50, Appendix B, Criterion XVI requires that measures shall be established to identify and correct conditions adverse to quality. The identification of the cause of the condition and the corrective action shall be documented and reported to appropriate levels of management. Past NRC inspections identified significant deficiencies in surveillance instructions required by the plant Technical Specifications. By letter of February 26, 1985 from TVA to NRC Region II, the licensee described corrective actions being taken to correct deficiencies in surveillance instructions.

Contrary to the above, as of April 19, 1985, corrective actions were not taken, in that, significant discrepancies were identified during an NRC inspection after completion of the licensee's corrective actions. Additionally, the TVA referenced letter stated that the Watts Bar Quality Engineering Staff would review a sample of surveillance instructions for technical adequacy following the reviews by the section supervisors. In fact, the review was conducted in parallel with the section supervisors, rather than following their review. Although significant discrepancies were found by Quality Engineering, the results were not compiled, summarized in documentation, and reported to appropriate levels of management for analysis of the adequacy of the section supervisors review.

TVA's Response

a. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

b. Reasons for the Violation

1. Failure of management to provide the following:

- (a) Sufficient time for the plant sections to adequately review and Plant Quality Assurance to survey surveillance instructions (SI) required to implement the Watts Bar unit 1 technical specification surveillance requirements.
- (b) Specific review guidance to draw attention to the specific causes that have contributed to the ongoing nature of this problem.

- (c) Establishment of an appropriate feedback mechanism whereby SI weaknesses could be critically identified by the individuals who performed the SI.
- 2. Lack of plant section attention to detail or consistency of approach in revising surveillance instructions.
- 3. Failure of management to ensure NRC understood its intent to have the Watts Plant Quality Engineering (PQE) Staff perform its technical adequacy review in parallel but independent of the plant section review after receipt of the NRC response (dated March 18, 1985) to the TVA letter of February 26, 1985, identified above.
- 4. Failure of the Watts Bar Plant Quality Assurance (PQA) Staff to recognize that its technical adequacy review of surveillance instructions was to be formally documented.

c. Corrective Actions Taken and the Results Achieved

- 1. TVA management committed to NRC in a meeting held with NRC Region II Management Staff on May 2, 1985 (as documented in NRC letter to TVA dated May 10, 1985) to perform the following:
 - (a) Watts Bar would re-review one hundred percent of the remaining surveillance instructions not reviewed by PQA before the applicable mode of operation.
 - (b) The review would be conducted by technical reviewers and supervisors who did not perform the original review.
 - (c) The procedures will be completed and approved before use and Mode 5 and 6 SIs will be completed before fuel load.
- 2. A formal checklist was issued by plant management on May 10, 1985 to specify the SI review criteria to be utilized in the re-review. The review criteria contained a procedure review checklist, the provisions of c.1 above, and the following special administrative requirements.
 - (a) The following PQA actions will be taken:
 - (1) PQE will perform another 10 percent sample review of SIs not previously reviewed in parallel with the review being completely independent of the sections. This PQE review will be accomplished by the mode required applicable.
 - (2) PQE will perform a second 10 percent sample review following the section review and after any procedure revisions have been made. This PQE review will be also be accomplished by the mode required applicable.

(3) PQE will provide a timely detailed written analysis of the c.1.(1) and (2) results and provide the analysis report to the plant manager for each mode or mode combination milestone.

(b) A separate checklist was developed to be used as a form of critique feedback by the SI performers on all SIs initially performed after May 6, 1985 and after all those SIs which must be performed again as a result of the re-review.

d. Corrective Actions Taken to Avoid Further Violations

1. A training session was held before the start of the review to go over the reasons for the review, the necessity for a complete detailed review, and to hold an open discussion on the procedure review checklist items and of the problems identified by NRC during its previous inspections on this subject.
2. PQE will formalize evaluations conducted in the future related to the SI process.
3. PQE will verify and document that all issued SIs have incorporated PQA identified deficiencies.
4. Plant management will ensure that the intent of TVA commitments made to NRC on significant issues are thoroughly discussed with NRC management to avoid misunderstandings.

e. Date When Full Compliance will be Achieved

Mode 5 and 6 SIs will be completed before fuel load and Modes 1, 2, 3, and 4 SIs will be accomplished before their required mode operable.