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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

SEP 30 1986

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

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - REVISED RESPONSE TO VIOLATIONS
391/85-36-01 AND 391/85-36-04

This letter is in response to R. D. Walker's letter dated August 2, 1986, IE Inspection Report Nos. 50-390/85-45 and 50-391/85-36, citing activities at Watts Bar Nuclear Plant which appeared to be in violation of Nuclear Regulatory Commission (NRC) regulations. Enclosed is our revised response to citation 391/85-36-01 and 391/85-36-04 which supersedes our previous response dated August 29, 1985. This is our final report on this item of noncompliance.

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

If there are any questions, please get in touch with J. A. McDonald at (615) 365-8527.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley
R. Gridley, Director
Nuclear Safety and Licensing

Enclosure

cc (Enclosure):

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

Mr. G. G. Zech
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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
REVISED RESPONSE TO NRC-OIE LETTER FROM R. D. WALKER TO H. G. PARRIS
DATED AUGUST 2, 1986
REFERENCE: IE INSPECTION REPORT NOS. 390/85-45 AND 391/85-36

This revised report supersedes our previous response to the Notice of Violation described in enclosure 1 of the OIE inspection report referenced above. This constitutes a revised final report on this item of noncompliance.

Violation 391/86-36-01

10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the PSAR, requires that activities affecting quality be accomplished in accordance with documented procedures. Attachment A, "Construction Loading Guidelines" of TVA procedure Watts Bar Nuclear Plant (WBN) Quality Control Instruction (QCI) 1.07, revision 11, "Work Release," allows up to 400 pounds of live load due to construction personnel on cable trays and heating, ventilating, and air-conditioning (HVAC) duct greater than 12-inch by 12-inch cross-section and requires that the duct or tray be covered with plywood when live loads are applied.

Contrary to the above, on June 18, 1985, activities were not accomplished in accordance with documented procedures, in that construction craftsmen were observed working on top of seismic I HVAC duct between S&T lines near elevation 747 in the reactor building without covering the duct with plywood.

This is a severity level V violation (supplement II).

Response

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

The violation is a result of failure to follow procedure WBN QCI-1.07, revision 11, "Work Release," in that an electrical craftsperson was standing on a seismic category I HVAC duct without covering the duct with plywood as required by attachment B of this procedure.

Corrective Steps Taken and Results Achieved

There was no evidence of damage to the duct. Disciplinary action and additional training were administered to the craft worker involved in this violation.

Corrective Steps Taken to Avoid Further Noncompliance

To preclude recurrence of this violation, the construction superintendent initially directed that formal training on WBN QCI-1.07 be administered to craft employees on a quarterly basis. This training emphasized the requirements for protecting permanent plant features from potential damage due to transient loads. However, it has subsequently been determined that formal training on a quarterly basis is not the most cost effective means of maintaining craft awareness of their responsibilities as related to the violation. Training which addresses the same areas will continue to be conducted by periodically incorporating the required information into craft weekly safety meetings. By inclusion of this information in the weekly safety meetings, all craft employees will be made aware of the importance of adhering to established guidelines given in QCPs and QCIs.

Date When Full Compliance Will Be Achieved

TVA is now in full compliance.

Violation 391/85-36-04

10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the PSAR, requires that activities affecting quality be accomplished in accordance with documented procedures. ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants," and Watts Bar Nuclear Plant (WBN) Quality Control Procedure (QCP)-1.36, revision 6, "Storage and Housekeeping," were identified as the applicable procedures for housekeeping. ANSI N45.2.3, paragraph 3.3 and Watts Bar Nuclear Plant WBN QCP-1.36, paragraph 7.2.2.4, require that permanent installed equipment be protected to prevent damage from construction activities. Paragraph 7.2.2.4 specifically requires protection from welding arcs by barriers, screens, shields, or other means as necessary.

Contrary to the above, on June 20, 1985, activities were not accomplished in accordance with documented procedures in that a considerable amount of debris and miscellaneous scrap materials were observed abandoned on top of installed unprotected cable in trays. Welding sparks and slag were also observed falling on top of unprotected cable in trays due to omission of protective coverings.

This is a severity level IV violation (supplement II).

Response

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason fo Violation

This violation is a result of a failure to follow procedure WBN QCP-1.36, revision 6, "Storage and Housekeeping," as debris and miscellaneous scrap material were observed in cable trays at elevation 718. This is attributed to an apparent failure to adequately train employees in this procedure. Welding sparks and slag were also observed falling on top of class 1E cables from work being performed on a higher elevation. This was an oversight, as the sparks and slag had fallen to a lower elevation than anticipated.

Corrective Steps Taken and Results Achieved

Immediate steps were taken to protect the cable at the time the violation was identified. No evidence of damage was observed on the cable. The debris and miscellaneous scrap materials have been removed from the cable trays.

Corrective Steps Taken to Avoid Further Noncompliance

Initially, employees were formally retrained in WBN QCP-1.36, revision 6, with special emphasis on paragraph 7.2 regarding the requirement for housekeeping practices and conditions. Also, the construction superintendent directed that this formal training be conducted on a quarterly basis. However, it has subsequently been determined that formal training on a quarterly basis is not the most cost effective means of maintaining craft awareness of their responsibilities as related to the violation. Training which addresses the same areas will continue to be conducted by periodically incorporating the required information into craft weekly safety meetings. By inclusion of this information in the weekly safety meetings, all craft employees will be made aware of the importance of adhering to established guidelines given in QCPs and QCIs. Additionally, a program has been established wherein a roving firewatch is to inspect work areas to ensure protection of plant features from fire hazards. They inspect in detail the areas of work requiring fire permits (trays which contain safety-related cable). These actions will preclude recurrence of this violation.

Date When Full Compliance Will Be Achieved

TVA is now in full compliance.

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