TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

October 27, 1980 P 2:21

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC INSPECTION REPORT 50-390/80-26 AND 50-391/80-20 - RESPONSE TO DEVIATION 50-390/80-26-01

The subject inspection report dated September 30, 1980, cited TVA with one deviation concerning UHI preoperational testing. Enclosed is TVA's response.

If you have any questions, please get in touch with D. L. Lambert at FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure
cc: Mr. Victor Stello, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

8012020412

OFFICIAL COPY

An Equal Opportunity Employer

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO DEVIATION 50-390/80-26-01

Deviation 50-390/80-26-01

A letter from L. M. Mills to L. S. Rubenstein dated March 21, 1980, committed to the provision of test acceptance criteria for evaluating the low pressure blowdown portion of the Upper Head Injection (UHI) system test at Watts Bar with respect to the Sequoyah unit 1 performance. Also, the Sequoyah unit 1 water level setpoint was committed to be utilized at Watts Bar.

Contrary to the above, as of July 6, 1980, the UHI system low pressure blowdown test was performed without provisions of the test acceptance criteria to the personnel performing the test and without utilization of the Sequoyah unit 1 water level setpoint.

Corrective Actions

Acceptance criteria will be provided by Westinghouse to TVA for evaluating the Watts Bar unit 1 low-pressure blowdown portion of the upper head injection (UHI) system test. The UHI system test scoping document and test instruction will be revised to incorporate the additional acceptance criteria and utilize the Sequoyah unit 1 water level setpoint. An evaluation of the data collected during the low-pressure blowdown for unit 1 at Watts Bar will be conducted using the revised test criteria and a retest conducted if any criteria are not met.

The implications of this deviation relating to the quality of the overall preoperational test program have been evaluated. It has been concluded that this incident does not demonstrate a generic weakness in the test program because of the unusual circumstances surrounding this deviation.

The scope of testing for the UHI system test underwent a major revision by deleting the high-pressure blowdown test just prior to the planned start of testing. Even though the Engineering Design (EN DES) test representative was aware that Westinghouse still had to provide acceptance criteria for the low-pressure blowdown test, he approved a change to the test instruction which deleted the high-pressure blowdown test and contained only general acceptance criteria. The EN DES test representative felt that specific acceptance criteria would be available by the time the preoperational test results were received for his review. The Nuclear Power (NUC PR) test director initiated the change to the test instruction without ensuring that all required specific acceptance criteria were addressed. The approval of the change was an error in judgment on the part of the EN DES test representative. The NUC PR test director and other personnel involved in review and approval of preoperational test documents who may have identified the procedural error were unaware of the commitment by Westinghouse to supply the acceptance criteria.

Corrective Actions To Avoid Further Deviations

To verify that the deviation is not indicative of a generic procedural problem, a sample of preoperational test instructions will be reviewed by EN DES to determine that no inconsistencies exist between commitments and test instruction requirements. The EN DES procedures for preoperational testing have been reviewed and clearly require that acceptance criteria be available prior to EN DES approval of

preoperational test instructions. A special precaution will be added to EN DES EP-6.01 to further ensure that acceptance criteria have been identified to the test director prior to test performance. A review of acceptance criteria for preoperational test scoping documents and test instructions for incompleted tests will be performed by NUC PR to ensure that specific acceptance criteria are defined.

Date Corrective Actions Will Be Completed

All corrective actions will be completed by December 6, 1980.