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CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

February 19, 1981

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 RII:CJ
50-390/80-21, 50-391/80-15 - ADDITIONAL REVISED RESPONSES

The subject inspection report dated August 14, 1980, cited Tennessee Valley Authority (TVA) with four infractions and four deficiencies. TVA's responses were provided on September 11, 1980, and revised responses were submitted on November 24, 1980. Enclosed are additional revisions to the subject responses.

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

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
INSPECTION REPORT 50-390/80-21, 50-391/80-15
ADDITIONAL REVISED RESPONSES

INFRACTION 390/80-21-04

As required by 10 CFR 50, Appendix B, Criterion V, and implemented by Watts Bar Nuclear Plant, FSAR, Section 17.1A.5, activities affecting quality must be prescribed by appropriate instructions.

Contrary to the above, as of June 27, 1980, no instructions authorized the current practice of adding Sepco Grafoil Ribbon Tape to spiral wound gaskets. Also, no procedures controlled the procurement, storage, handling, and installation of this tape or the storage or handling of spiral wound gaskets to assure appropriate compatibility with cleanliness classification of the safety-related piping systems in which they are used.

This is an infraction applicable to unit 1.

Corrective Action Taken And Results Achieved

Certification has been received from SEPCO, the crinkle tape manufacturer, which establishes the leachable chlorides of the tape and that it is not detrimental to system cleanliness.

Action Taken To Prevent Recurrence

Watts Bar Nuclear Plant Quality Control Instruction (WBNP-QCI) 4.31 has been issued authorizing the use of Sepco Grafoil Crinkle Tape and defines its handling, storage, and installation. Personnel have been trained in the use of Grafoil Crinkle Tape and the requirements of the instruction. Procurement of this tape is accomplished in accordance with Watts Bar Nuclear Plant Quality Control Procedure (WBNP-QCP) 1.20, "Site Control of Procurement Documents," or WBNP-QCP 1.17, "Transfer of Materials, Parts, and Components."

On November 10, 1980, TVA's Division of Construction (CONST) prepared a memorandum requesting TVA's Division of Engineering Design (EN DES) to provide information on spiral wound gaskets in connection with unresolved Item 390/80-21-04. This information was provided by EN DES to CONST in a December 23, 1980, memorandum and a Purchase Specification, PF-4951, was issued. As a result of the memorandum, CONST revised WBNP-QCI 4.31 to define the storage and handling of spiral wound gaskets.

Date When Full Compliance Will Be Achieved

We are now in full compliance.

DEFICIENCY 390/80-21-06 AND 391/80-15-02

As required by 10 CFR 50, Appendix B, Criterion V, and implemented by Watts Bar Nuclear Plant, FSAR, Section 17.1A.5, activities affecting quality must be accomplished in accordance with documented instructions. Step 5.2 of Watts Bar Field Instruction (WBFI) G-10, Disposition of Engineering Change Notices (ECN), requires the Quality Control and Records Unit to receive completed ECN data packages from the ECN coordinator for filing. Additionally, Step 6.1.5 requires each responsible Engineering Unit and Modifications and Additions Group to update the ECN status report monthly.

Contrary to the above, as of June 27, 1980:

1. The Quality Control and Records (QC&R) Unit was not receiving completed ECN data packages.
2. Seven of eleven ECN's reviewed had been completed more than one month ago, yet the ECN status had not been updated to reflect completion.

Corrective Action Taken And Results Achieved

Watts Bar Field Instruction G-10 has been rewritten to delete the requirement for the QC&R Unit to file ECN data packages. All completed ECN data packages are now stored in Startup, Test, and Coordination (ST&C) Unit. The status of ECN's 1744 and 1948 has been updated to show their completion. Engineering unit supervisors have been notified that ECN's 2274, 1965, 2275, 2426, and 1824 are complete and that they are required by WBFI G-10 to verify that the ECN's are complete.

Action Taken To Prevent Recurrence

WBFI G-10 has been rewritten as a Watts Bar Nuclear Plant Quality Control Instruction (WBNP-QCI) to define the engineering unit responsibilities for verifying ECN completion status and to state that completed packages will be stored in ST&C Unit.

Date When Full Compliance Will Be Achieved

WBFI G-10 has been reissued as a WBNP-QCI. The completion status of ECN's 2274, 1965, 2275, 2246, and 1824 has been updated to show their completion.

In addition to these corrective actions for the given items of noncompliance, TVA has implemented a Quality Assurance Training Program, Watts Bar Nuclear Plant Quality Control Instruction (WBNP-QCI) 1.11. This program has responsibility for indoctrination and training of site employees performing quality-affecting activities in order that appropriate proficiency is achieved and maintained. It also defines the program for certification of inspection, examination, and testing personnel.