

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

April 6, 1981

APR 8 9:30

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-OIE INSPECTION REPORT
50-390/80-36, 50-391/80-28 - TVA RESPONSES

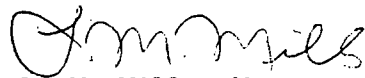
The subject inspection report dated March 10, 1981, cited TVA with three violations. Enclosed are TVA's responses.

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

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

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
RESPONSE TO NRC-OIE INSPECTION REPORT
50-390/80-36, 50-391/80-28

VIOLATION 390/80-36-01 AND 391/80-28-01

Appendix B, Criterion V of 10CFR50 requires activities affecting quality to be accomplished in accordance with instructions. The accepted QA program, FSAR Section 17.1A.5, states that assurance is provided that activities are accomplished in accordance with these instructions. Section 5.2 of WBNP-QCP-1.2, "Control of Nonconforming Items," requires engineering personnel to assure identification of nonconforming items by initiating nonconforming condition reports.

Contrary to the above, as of December 29, 1980, engineering personnel had not initiated a nonconforming condition report for 1/2-inch id carbon steel safety-related piping which supports operation of the essential raw cooling water pumps. This condition had been observed by the licensee on or about November 12, 1980.

Admission or Denial of the Alleged Violation

Admitted. Based on addendum 2 of QCP-1.2 which was issued December 12, 1980, establishing specific time limits for issuing an NCR, we were in violation.

Reason for the Violation if Admitted

The incident was discovered in November and, under the then current revision to the QCP, we were still investigating the problem. The individuals involved were not aware of the generic corrosion problem at TVA until they were into their investigation. The NCR was to be written at the conclusion of the investigation.

Corrective Steps Which Have Been Taken and Results Achieved

An NCR was issued December 30, 1980, addressing the corrosion found in 1/2-inch id carbon steel pipe associated with the ERCW pumps.

Corrective Steps Which Have Been Taken to Avoid Future Violations

Engineers have been instructed to initiate an NCR if a condition is discovered and to ensure that issuance complies with requirements of Addendum 2 of QCP 1.2.

Date of Full Compliance

Revision 2 of QCP-1.2, "Control of Nonconforming Items," is currently in a review cycle with an expected issue date of April 10, 1981. Training on this revision is expected to be completed by May 1, 1981.

VIOLATION 390/80-36-03 AND 391/80-28-03

Appendix B, Criterion XVI of 10CFR requires measures to assure that conditions adverse to quality are corrected. The accepted QA program, FSAR Table 17.1A-1, provides for corrective action to be implemented per OEDC-QAP-16.0, "Corrective Action." Attachment 1 to OEDC-QAP-16.0 assigns the Division of Engineering Design (EN DES) responsibility for correction of EN DES conditions adverse to quality. The Essential Raw Cooling Water (ERCW) System Corrosion/Constriction Study (MEB 780104 021) identified that flow through 1/2-inch diameter carbon steel lines in the ERCW System would become completely constricted by corrosion.

Contrary to the above, as of December 30, 1980, measures did not assure the correction of the identified corrosion/constriction of ERCW piping in that no corrective action was taken or proposed for the 1/2-inch diameter carbon steel piping supplying prelube and motor cooling water to the ERCW pumps.

This is a Severity Level V Violation (Supplement II.E).

Admission or Denial of the Alleged Violations

The violation occurred as stated.

Reason for the Violation

The violation occurred because the ERCW System corrosion constriction study was performed on the Sequoyah Nuclear Plant only. A statement was included in the report which required that those carbon steel pipes identified at Sequoyah for replacement to stainless steel also be replaced at Watts Bar. This statement was based on the assumption that Watts Bar was identical to Sequoyah. This assumption was incorrect; motor cooling lines are stainless steel and the prelube lines do not exist at Sequoyah; whereas at Watts Bar the prelube and motor cooling water lines are carbon steel. Therefore, the changes were omitted.

Corrective Steps Which Have Been Taken and Results Achieved

The subject lines are being changed to stainless steel.

Corrective Steps Which Will be Taken to Avoid Further Violations

The ERCW System at Watts Bar is being reviewed to verify that all carbon steel lines have been identified and that the required changes will be implemented.

Date When Full Compliance Will be Achieved

The review and required modifications are scheduled for completion by May 31, 1981.