UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

MAR 1 9 1981

Tennessee Valley Authority
ATTN: H. G. Parris
Manager of Power
500A Chestnut Street Tower II
Chattanooga, TN 37401

Gentlemen:

Subject: Report Nos. 50-390/80-21 and 50-391/80-15

This refers to your letters of November 24, 1980, January 8, 1981 and February 19, 1981, informing us of steps you have taken to correct the items of noncompliance concerning activities under Construction Permit Nos. CPPR-91 and CPPR-92 brought to your attention in our letter of August 14, 1980. We have reviewed these responses collectively and noted the following inadequacies.

The February 19, 1981, response to item a (390/80-21-04) does not address the Division of Nuclear Power, NUC-PR, storage and handling requirements for sprial wound gaskets.

Your November 24 and January 8, responses to noncompliance item c (390/80-21-01) addressed those improvements in procedures and training of Division of Construction and Division of Nuclear Power personnel which should result in future equipment transfers having appropriate identification and evaluation of incomplete work, nonconforming work, and incomplete QA documentation. However, the responses did not address any effort to upgrade similar controls over equipment transferred prior to your implementation of improved controls with the January 1981, transfer of portions of the Essential Raw Cooling Water System (67-2). Additionally, your January 8, 1981, response did not provide a commitment date for the issuance and implementation of revisions to the interdivisional procedure which controls turnover of systems.

The February 17, 1981, response to item f (390/80-21-06, 390/80-15-02) does not address any effort to update the status of completion of other engineering change notices beside the specific seven examples cited by our inspector.

It is our understanding that in a telephone conversation of March 13, 1981, between D. Ormsby of TVA and J. McDonald of this office, it was agreed that TVA would supply supplemental information to your responses. Accordingly, within 10 days of your receipt of this letter, please provide to this office the agreed upon supplemental responses.

We will examine your corrective actions and plans during subsequent inspections.

Sincerely,

R. C. Lewis

R. C. Lewis, Acting Director
Division of Resident and Reactor
Project Division

cc: C. C. Mason, Acting Plant Superintendent
Joseph E. Wilkins, Project Manager
J. F. Cox, Supervisor,
Nuclear Licensing Section
D. P. Ormsby, Project Engineer
H. N. Culver, Cheif,
Nuclear Safety Review Staff
H. J. Green, Division Director

TENNESSEE VALLEY AUTHORITY
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.