

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

January 24, 1980

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:

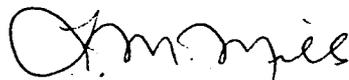
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II LETTER  
RII:RWW 50-390/79-45, 50-391/79-39 - INSPECTION REPORT - RESPONSE  
TO INFRACTIONS AND DEFICIENCY

The subject letter dated January 4, 1980, cited TVA with two infractions  
and one deficiency in accordance with 10 CFR 2.201. Enclosed are our  
responses to the infractions and the deficiency.

If you have any questions concerning this matter, please get in touch  
with D. L. Lambert at FTS 854-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Jr., 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 INFRACTIONS AND DEFICIENCY  
IN INSPECTION REPORT 50-390/79-45 AND 50-391/79-39

INFRACTION 50-390/79-45-01 AND 50-391/79-39-01

As required by 10 CFR 50 Appendix B, Criterion V and implemented by Watts Bar FSAR Paragraph 17.1A.5, "activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with those procedures." WBNP Quality Control Procedure QCP-1.2, Paragraph 2.0, states in part, "nonconformances determined to be repetitive are documented in accordance with WBNP Quality Control Procedure QCP-1.4 - Conditions Adverse to Quality and Corrective Action."

Contrary to the above, nonconformances NCR Nos. 1560R, 1636R, 1678R, 1705R, 1634R, 1635R, 1670R, 1771R, 1647R1, and 1803R are repeated instances of crafts bypassing engineering hold points which should have been documented as Conditions Adverse to Quality per procedure.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

While these Nonconforming Condition Reports (NCR's) span a three-month time frame, a review of the documentation packages they cover shows about a two-year period of craft work. This has resulted from the emphasis placed on finalization of documentation in the past year during which old errors have been discovered.

A total of 103 NCR's have been generated because of discrepancies involving code documentation since the beginning of the project, out of approximately 14,000 code data packages which have been finalized. The conditions adverse to quality are corrected in the disposition of the Nonconforming Condition Reports (NCR's).

ACTION TAKEN TO PREVENT RECURRENCE

WBNP-QCP-1.2 and 1.4 are being combined to bring Watts Bar Nuclear Plant into full agreement with the divisions policy on nonconformances. An NCR will now be written for all situations involving Criteria XV and XVI. This will eliminate the confusion which existed among employees as to when to apply the NCR procedure and when to apply the Conditions Adverse to Quality Report (CAQR) procedure. It will also allow a better interface with the Engineering Design QA program, as Watts Bar is the only site using the CAQR.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

We will be in full compliance by February 22, 1980.

DEFICIENCY 50-390/79-45-02, 50-391/79-39-02

As required by 10 CFR, Part 50.55, Paragraph (e), "Conditions of Construction Permit," as implemented by WBNP Quality Control Procedures QCP-1.2 and QCP-1.4, states in part "... The holder of the permit shall notify the commission of each deficiency found in design and construction, which were to have remained uncorrected, could have affected adversely the safety of operations of the plant at anytime throughout the expected lifetime of the plant, and which represents:

.....(i) a significant breakdown in any portion of the quality assurance program conducted in accordance with the requirements of Appendix B;..."

Contrary to the above, nonconformance condition reports, NCR Nos. 1560R, 1634R, 1635R, 1636R, 1647R1, 1670R, 1678R, 1708R, 1771R, and 1803R, and conditions adverse to quality reports, CAQR's Nos. M-18, M-20, M-23, M-27, M-32, M-33, M-34, M-37, and M- ? (dated 4/9/79), document repetitive deficiencies in the installation of safety-related piping that indicates a breakdown in the quality assurance program established to meet the requirements of Appendix B. This breakdown in the QA program was not reported to the NRC in accordance with 10 CFR 50.55(e) requirements.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Nonconforming condition report, NCR No. 1803R has been upgraded to "significant" and transmitted to Division of Engineering Design (EN DES) for determination of reportability in accordance with existing procedures.

ACTION TAKEN TO PREVENT RECURRENCE

1. Training will be given to Mechanical Engineering Unit (MEU) employees on how to prepare an NCR, with emphasis on what description is needed and when the actual nonconformance occurred. This will enable the NCR's to convey much more meaningful information and therefore the Engineering Unit Supervisor and the Construction Engineer will be able to be more alert for generic or repetitive conditions.
2. NCR status reporting will be transferred to an Information Processor, so that a printout of NCR's for Code or other activity work can be sorted on a periodic basis or as requested. This will allow an additional review by the Engineering Unit Supervisor and the Construction Engineer for generic or repetitive conditions.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

We will be in full compliance by February 22, 1980.

INFRACTION 50-390/79-45-03 AND 50-391/79-39-03

As required by 10 CFR 50, Appendix B, Criterion XVI, and as implemented by Watts Bar FSAR, Section 17, 1A.16 entitled "Corrective Action," in case of significant conditions adverse to quality, corrective measures shall assure that the cause of the condition is determined and corrective action is taken to preclude repetition.

Contrary to the above, repetitive nonconformance conditions reports (NCR's) and conditions adverse to quality reports (CAQR's); NCR Nos. 1560R, 1634R, 1635R, 1636R, 1641R1, 1670R, 1678R, 1771R, 1803R; CAQR Nos. M-18, M-20, M-23, M-27, M-32, M-33, M-34, M-37, M-? (dated 4/9/79) are instances of repeated noncompliances violating the same requirement (bypassing of engineering hold points by piping/welding crafts). The repetitive occurrence of these violations is considered to be significant. Although craft training was administered to prevent recurrence, the training given did not preclude repetition.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

TVA has reviewed the training given to steamfitter craft employees on the Watts Bar Quality Assurance Program. Craft training has been administered periodically since the beginning of the project, with the latest session conducted on November 20 and 21, 1979. In the November 1979 training sessions, greater emphasis was placed on the problem of passing of hold points. Since completion of this most recent training, we are not aware of any work completed which has been nonconformed for passing of hold points by crafts, indicating the situation is now under control.

ACTION TAKEN TO PREVENT RECURRENCE

TVA has used general craft training and specific disciplinary action as past methods to ensure compliance by crafts with QA program requirements. Such training will continue with increased emphasis on the importance of hold points and the requirement to comply with procedural requirements.

DATE FULL COMPLIANCE WAS ACHIEVED

We are now in full compliance.