TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

March 14, 1980

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OFFICIAL COPY

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:RJH 50-390/79-47, 50-391/79-40 - INSPECTION REPORT - REVISED RESPONSE TO DEFICIENCY

The subject letter dated January 14, 1980, cited TVA with one deficiency. TVA provided a response to this deficiency on February 4, 1980, in accordance with 10 CFR 2.701. Enclosed is a revised response which provides further clarification of the corrective action taken by TVA.

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

T. M. Mills, Manager Nuclear Regulation and Safety

Enclosure

cc: h

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

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 DEFICIENCY 50-390/79-47-01 AND 50-391/79-40-01 REVISED RESPONSE

Deficiency

As required by Criterion V of Appendix B to 10 CFR 50 and implemented by Watts Bar Nuclear Plant (WBNP) FSAR Section 17.1A.5, activities affecting quality shall be accomplished in accordance with prescribed procedures for activities affecting quality. WBNP Quality Control Procedure (QCP) 3.1, revision 10, paragraph 6.3.1.8, requires that "no insulated cable will be tagged as conforming material or issued for installation until a favorable certificaiton status report is received..."

Contrary to the above, two instances were noted where the requirements of the QCP were not complied with. The two instances noted are as follows:

- Cable purchased per TVA contract number 78K5-823412-1, reel number WB-9384, Type WHB-1 was tagged "Conforming Material-Class IE," installed as safety-related cable number 1-3PL-62-6149-A, and QC inspected on October 11, 1979. A review of the certification status report on October 26, 1979, determined the cable was not listed as certified material.
- b. A "Partial Certification Form" dated October 29, 1979, was provided as certification that the cable identified above was conforming material. WBNP-QCP-3.1 does not recognize a "Partial Certification Form" as a method for certifying material.

Corrective Action Taken and Results Achieved

- a. The cable that was incorrectly tagged "Conforming Material Class IE" has been properly certified and recorded in the certification status report in accordance with WBNP-QCP-3.1.
- Procedure WBNP-QCP-3.1 has been revised to recognize a "Partial Certification Form" as a method for certifying material. This is Revision No. 11, which was approved and issued on December 14, 1979.

Corrective Action Taken to Avoid Further Noncompliance

a. TVA believes that the original failure to follow WBNP-QCP-3.1 was an isolated occurrence. The potential severity of failure to follow this procedure has been discussed with engineering and craft employees involved in these activities. In order to better ensure compliance with Procedure WBNP-QCP-3.1, this procedure will be revised again to include the requirement that engineering employees verify that cable reel numbers entered on TVA form 575, "Storeroom Requisition," by warehouse employees are "Conforming Material - Class IE." Engineering employees will also be required by the procedure to



verify that cable reel numbers are entered on the certification list and approved for issue to craft employees. Engineering and craft employees involved in these activities will be given additional training on this revised procedure.

Revision II to WBNP-QCP-3.1 has been approved and issued to recognize the partial certification form. TVA believes that this revised procedure will prevent further noncompliance.

Date When Full Compliance Will Be Achieved

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a. Full compliance will be achieved by April 18, 1980.

b. Full compliance was achieved on December 14, 1979.