TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

June 10, 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 UNIT 1 - NRC-OIE REGION II LETTER
RII:MCA 50-390/80-08 - RESPONSE TO INFRACTION

The subject letter dated May 2, 1980, cites TVA with one infraction. Enclosed is TVA's response to that infraction.

If you have any questions concerning this matter, 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, 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 UNIT I
RESPONSE TO INFRACTION 50-390/80-08-01

As required by 10 CFR 50, Appendix B, Criterion V, activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. The accepted Quality Assurance Program, Section 17.1A.5, states that activities affecting quality are prescribed by documented instructions in the form of drawings, specifications, and procedures.

1. QCP-4.14, "Lubrication Control for Permanent Mechanical Equipment," establishes a periodic lubrication program for mechanical equipment and requires the responsible engineer to determine the lubrication requirement before prefunctional testing.

   Contrary to the above, QCP-4.14 did not contain the controls required to ensure appropriate lubrication for valves FCV-87-21, 22, 23, and 24 before prefunctional testing. The lubrication program for the valves was established on January 31, 1980, and the valves were operated on February 3, 1980, for prefunctional system flushing. Initial lubrication was either verified or performed on February 28, 1980.

2. QCP-3.10, "Installation, Documentation, and Removal of Temporary Electrical Connections," requires temporary cables or jumpers be designated in the "Temporary Connection Log."

   Contrary to the above, procedures were not followed in that temporary cables were placed on valves FCV-87-21, 22, 23, and 24 gag solenoids and were not logged in the "Temporary Connection Log."

3. QCP-4.10, "Standard Inspection and Test Instructions for Mechanical Piping Systems," requires cleanliness of Class A, B, C, and D components or piping systems be maintained during erection. Paragraph 6.3.6.3.5 of Appendix E states that if it becomes necessary to leave a pipe opening item temporarily unattended, the protective cover and seal shall be reinstalled.

   Contrary to the above, three 3/4-inch openings of the 1BB containment spray pump piping were left open and unattended on March 24, 1980.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. Lubrication of the valves in question has been verified and the lubrication data sheets have been revised to include the valve stems.

2. and 3. These two examples were corrected during the course of the inspection.

ACTION TAKEN OR TO BE TAKEN TO PREVENT RECURRENCE

1. WBNP-QCP-4.14 has been reviewed, and an addendum will be issued to require initial lubrication to be performed before initial operation. WBNP-QCP-1.22, Attachment 1, is being revised to require the responsible engineer to verify that the initial equipment lubrication has been performed before signing the initial operation release sheet.

2. Electrical engineering unit employees have been given further instructions to emphasize the importance of logging all temporary connections.

3. The requirement to keep pipe openings covered has been reemphasized to craft supervisors and in particular to the foreman who was responsible for this area. In addition a craftsman has been assigned to make a surveillance of work areas on a daily basis. One of his assignments is to be alert for pipe openings left unattended and to see that any found are covered and sealed.

   Mechanical engineering unit employees have been given further instructions on Appendix E of WBNP-QCP-4.10. Emphasis on maintaining system cleanliness and being alert for openings which should be covered were the subject of these instructions.

DATE CORRECTIVE ACTION WILL BE ACHIEVED

We are now in full compliance.