

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

October 21, 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:LM 50-390/80-25, 50-391/80-19 - RESPONSE TO INFRACTIONS

The subject letter dated September 26, 1980, cited TVA with infractions  
390/80-25-01,-02 and 391/80-19-01,-02. Enclosed are TVA's responses to  
these infractions.

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  
RESPONSE TO INFRACTION 390/80-25-01,-02 AND 391/80-19-01,-02

Infraction 390/80-25-01 and 391/80-19-01

As required by 10 CFR 50, Appendix B, Criterion V, and implemented by TVA's Quality Assurance Program Policy (QAPP)-5, "Instructions, Procedures, and Drawings," states in part, "Activities affecting quality, including quality assurance and verifying, shall be prescribed and accomplished in accordance with documented instructions, procedures, or drawings."

Contrary to the above, Watts Bar Nuclear Plant failed to provide an adequate procedure to perform inspections of safety-related supports. QCP-4.23, "Standard Inspection and Documentation Requirements for Seismic Supports," was identified to be inadequate to perform the intended function in February of this year, had not been revised, and had been used in its present form to conduct the inspection.

Corrective Action Taken and Results Achieved

WBNP-QCP 4.23 has been rewritten to include additional inspection items required by IE Bulletins 79-02 and 79-14. Criteria for Embedded Anchor Plug Depth will be incorporated into WBNP-QCP 4.23 when completed and approved.

Action Taken to Prevent Recurrence

TVA recognized that WBNP-QCP 4.23 was not revised in a timely manner. We have taken steps to decrease the time required to change a procedure by adding the use of addenda to our instruction on procedure preparation and revision, WBNP-QCP 4.23, Revision 1.

Date When Full Compliance Will Be Achieved

We anticipate incorporating Anchor Plug Depth Criteria into WBNP-QCP 4.23 by January 1, 1981. We are now in full compliance for other items.

Infraction 390/80-25-02 and 391/80-19-02

As required by 10 CFR 50, Appendix B, Criterion V, and implemented by TVA's Quality Assurance Program Policy (QAPP)-5, "Instructions, Procedures, and Drawings," which states in part, "Activities affecting quality, including quality assurance and verifying shall be prescribed and accomplished in accordance with documented instructions, procedures, or drawings." WBNP-QCP 4.23, Standard Inspection and Documentation Requirements for Seismic Supports, Appendix B, Section 6.1, states in part, "Inspect the support to verify that it conforms to fabrication tolerances and that it conforms to drawings, specifications. . ." and WBNP-QCP 4.28, Piping Location Verification, Section 7.1 states in part, "Piping location shall be acceptable when its configuration, location. . .correspond to the EN DES-approved drawings. . . ."

Contrary to the above, two examples were cited that the QC inspectors failed to follow the procedures.

1. Support 1-70-873 on the Component Cooling System had a sign out chit as being finalized. The support was missing a cotter pin and installed with the wrong clamp. The signed chit was not checked for a snubber and the remaining boxes on the chit were not N/A as required by the procedure.
2. TVA Shop Sketch No. 464-3, Revision 1, (Component Cooling) was checked for pipe verification. A discrepancy was identified on the sketch from the field inspections that exceeded the tolerance given in the procedure. This discrepancy was not reported to EN DES for evaluation as required by the procedure.

#### Corrective Action Taken and Results Achieved

1. The cotter pin on support 1-70-873 has been replaced. The clamp identified by the NRC inspector as being the wrong clamp has been verified to be the correct clamp. It was verified that the snubber had been inspected. The chit has been revised to show which inspections are completed and which ones were "N/A."
2. The discrepancy identified was rechecked, and it was determined that an error had been made either in the actual measurement or in noting the measurement on isometric IC-63. No out-of-tolerance condition exists for this particular dimension. This "marked up" drawing had just been returned from the field at the time of this NRC inspection and had not yet been reviewed by the system engineer to identify discrepancies. Therefore, no NCR had been written to report the problem for evaluation and, in this particular case, no NCR was needed.

#### Action Taken to Prevent Recurrence

1. The missing cotter pin was an isolated instance, and Hanger Engineering Unit Inspection employees have all been retrained and certified in WBNP-QCP 4.23, Revision 1, which includes the proper method to fill out a chit.
2. We have revised our method of pipe location verification to greatly reduce the use of shop sketches and transfer of dimensions from one drawing to another. We now use the TVA piping drawing for location verification of all safety-related piping which is not field routed. Thus, errors resulting from marking dimensions on sketches and comparing sketches to the physical drawings are minimized.

#### Date Full Compliance Will Be Achieved

1. We are now in full compliance.
2. We are now in full compliance.