

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

USNRC REGION II
ATLANTA, GEORGIA

July 17, 1981 JUL 23 A 8:24

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 INSPECTION REPORT
50-390/81-11 AND 50-391/81-11 - TVA RESPONSES

The subject report dated June 11, 1981 cited TVA with one violation and requested information concerning management attention to nonconformance reports. Enclosed are TVA's responses.

This information was originally scheduled for submittal to the NRC by July 13, 1981. The delay in providing the requested information was discussed with NRC-OIE Inspector R. V. Crlenjak. We expect to provide additional information by September 30, 1981.

If you have any questions, please get in touch with D. L. Lambert at FTS 857-2581.

To the best of my knowledge, I declare the statements contained herein are complete and true.

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

8108110360 810731
PDR ADOCK 05000370
Q PDR

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
NRC-OIE INSPECTION REPORT 50-390/81-11 AND 50-391/81-11
TVA RESPONSES

Noncompliance Item - Severity Level V Violation - 390/81-11-01,
391/81-11-01

10CFR50, Appendix B, Criterion V, requires activities affecting quality to be prescribed by instructions which include appropriate quantitative acceptance criteria. The accepted QA program, FSAR, Section 17.1A, commits to Safety Guide 28 which endorses ANSI N45.2-1971. Section 6 of the Standard contains the same requirements as does Criterion V of Appendix B. Quality Control Procedure QCP-4.7, Appendix B, SII-10, Section 6.4.2., requires that equipment be checked for compliance with manufacturer's thermal expansion provisions.

Contrary to the above, as of August 21, 1980, activities affecting quality were not prescribed by appropriate instructions in the manufacturer's instructions which specified tolerances allowing for the effects of thermal expansion were not used by the licensee when installing both Spent Fuel Cooling Heat Exchangers.

This is a Severity Level V Violation (Supplement II.E). Similar items were brought to your attention as items A.1 and A.4 in our letter June 20, 1980; items A, B, C, D, and E.2 in our letter dated August 14, 1980; and items A.2, A.3, and B.1 in our letter dated October 9, 1980.

Response

The "Details" section of the inspection report points out that only the generic implications of this violation need be addressed in the response.

The licensee has concurred in the circumstances. . . made modifications to the heat exchangers, and conducted appropriate training to prevent further violations. Therefore, in response to this item, the licensee need only address generic implications in this finding.

Generic Implications

Upon investigating other similar heat exchangers mounted either in the horizontal or vertical position, we have determined them to be acceptable in accordance with design drawings.

TVA has initiated a program to review additional generic implications and expects to provide a final report or additional information by September 30, 1981.

Noncompliance Item - Severity Level V Violation - 390/81-11-02

10CFR50, Appendix B, Criterion V, requires activities affecting quality to be prescribed by instructions which include appropriate quantitative acceptance criteria. The accepted QA program, FSAR Section 17.1A, commits to Safety Guide 28 which endorses ANSI N45.2-1971. Section 6 of the Standard contains the same requirements as does Criterion V of Appendix B.

Contrary to the above, activities affecting quality were not prescribed by appropriate instructions in that Construction Specification G-39 allowed sampling of flowpaths undergoing preoperational cleaning by the use of offline filter apparatus without providing specifications to ensure that a sample representative of particulate concentration in the process line was analyzed.

This is a Severity Level V Violation (Supplement II.E.) applicable to unit 1. A similar item was brought to your attention as item B.2 in our letter of May 27, 1980.

Response

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation

Construction Specification G-39 does not adhere to Regulatory Guide 1.28 in that no means are provided to ensure that a sample representative of particulate concentration in the process line is analyzed.

Corrective Steps Taken and Results Achieved

TVA believes that the sampling apparatus used at Watts Bar were effective and that samples drawn were representative. Samples for particulate analysis were usually drawn through a drain on the process pipe. The liquid was then checked for particulates by directing it through a 20-mesh screen in accordance with ANSI N45.21. Some systems were sampled periodically during cleaning and analyzed for contaminants. Successive samples showing trends and repetitive results demonstrated that representative samples were obtained.

Corrective Steps Taken to Avoid Further Noncompliance

The following statement will be added to section 8.4.3 of G-39:

Sample apparatus used to check for particulates shall draw samples from the side or bottom of the process pipe. Pipe drains or similar connections where the sample would be drawn at the pipe wall shall be used.

Date When Full Compliance Will Be Achieved

Full compliance with respect to above additions to Construction Specification G-39 will be achieved by October 1, 1981.