

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

USNRC REGION II
ATLANTA, GEORGIA

August 10, 1981 AUG 13 AIO: 16

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 INSPECTION REPORT
50-390/81-13, 50-391/81-13 - RESPONSE TO VIOLATIONS

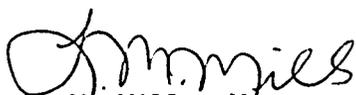
The subject inspection report dated July 8, 1981 cited TVA with two
Severity Level V Violations in accordance with 10 CFR 2.201. Enclosed is
our response as discussed with Inspector D. Quick by telephone on
August 10, 1981.

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

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO VIOLATIONS

Violation 390/81-13-01

10 CFR 50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality, such as malfunctions, are promptly identified and corrected. In the case of significant conditions, the cause of the condition must be determined and corrective action taken to preclude repetition. The accepted QA program, FSAR section 17.1A, commits to Safety Guide 28, which endorses ANSI N45.2-1971. Section 17 of the standard contains the same requirements as Criterion XVI of Appendix B.

Contrary to the above, as of June 14, 1981, measures were not established to assure corrective action for malfunctions in that several instances of excessive piping vibration and water hammer in the Safety Injection and Residual Heat Removal Systems were not identified, the cause adequately determined, or corrective action taken to preclude repetition.

This is a Severity Level V Violation (Supplement II.E) applicable to unit 1.

Response

Through conversations with the NRC resident inspector at Watts Bar Nuclear Plant, it is TVA's understanding that this item is closed and will be incorporated into inspection report 50-390/81-14.

Violation 391/81-13-01

10 CFR 50, Appendix B, Criterion XII, requires that measures be established to assure that instruments used in activities affecting quality are properly calibrated at specified intervals. The accepted QA program FSAR section 17.1A commits to Safety Guide 28 which endorses ANSI N45.2-1971. Section 13 of the Standard contains the same requirements as Criterion XII of appendix B.

Contrary to the above, as of June 1, 1981, measures were not established to assure instrument calibration in that procedural controls were not in place and temperature instruments used for in-progress testing of the 2BB diesel generator were not calibrated within their specified frequency and pressure instruments, used in that testing, had no frequency specified.

This is a Severity Level V Violation (Supplement II.E) applicable to unit 2.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation if Admitted

The present preventive maintenance (PM) program requires that transferred instruments be placed on the PM Program within 30 days after tentative transfer. Delays in the completion of construction for selected systems have resulted in the Instrument Maintenance Section not recognizing that some instruments were due for recalibration before tentative transfer. The policy of initiating preoperational testing immediately upon transfer did not allow time to identify and accomplish all PM requirements before the start of preoperational testing.

Corrective Steps Which Have Been Taken and Results Achieved

The specific instruments mentioned were not used in the preoperational test. These instruments have now been properly calibrated.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The scheduling of recalibration will begin with initial calibration using the intervals expected to be used after transfer.

The preoperational test will document that instruments used in the preoperational test are within their prescribed calibration interval. The PM Program will ensure that this calibration interval is maintained thereafter.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance by September 1, 1981. This will allow time to place approximately 10,000 instruments into the scheduling program.