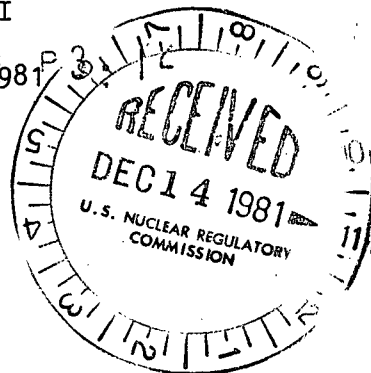


TENNESSEE VALLEY AUTHORITY
USNRC REGION II
CHATTANOOGA, TENNESSEE 37401, GEORGIA
400 Chestnut Street Tower II

October 8, 1981



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

IE HQ FILE COPY

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNIT 1 - NRC-OIE RII INSPECTION REPORT
50-390/81-06 AND 50-391/81-06 - REVISED RESPONSE TO VIOLATION

The subject inspection report dated April 29, 1981 cited TVA with one Severity Level V violation in accordance with 10 CFR 2.201. Our response to that violation was submitted on May 28, 1981. Enclosed is our revised response as discussed with Inspectors J. Coley and W. Kleinsorge during their site inspection conducted September 8-11, 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

A handwritten signature in cursive script that reads "L. M. Mills".

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

Q 12160 375

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1
REVISED RESPONSE TO VIOLATION 390/81-06-01Description of Violation

10CFR50, Appendix B, Criterion V, as implemented by Watts Bar FSAR section 17, paragraph 17.1A.5, requires activities affecting quality to be accomplished in accordance with documented procedures. TVA's Office of Engineering Design and Construction (OEDC) Quality Assurance Manual, section 4.1, revision 17, paragraph 2.3.3, states that, "all operations and hold or witness points shall be signed off and dated on the operation sheets." The TVA inspector and/or the Authorized Nuclear Inspector must witness, verify or conduct examinations before work and proceed to the next operation." TVA Process Specification 5.M.2.1(2), paragraph 8.1, also requires that the delta ferrite number or percent ferrite be recorded on the weld inspection form for that weld.

Contrary to the above, on April 1, 1981, completed work packages and reviewed records for reactor coolant pressure boundary (RCPB) pipe welds did not comply with procedural requirements as shown by the following examples:

1. RCPB pipe weld nos. 1-068D-W002-01 and 1-068F-W001-01 had no hold point for the delta ferrite examination signed off or dated and no delta ferrite number or percent ferrite recorded.
2. RCPB pipe weld nos. 1-068D-W004-01 and 1-068F-W003-01 had no delta ferrite number or percent ferrite recorded.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

There was insufficient document review before finalization.

Corrective Steps Taken and Result Achieved

Review of finalized documents in the vault revealed that, of 148 stainless steel welds whose material thickness is greater than one inch, the documentation for 33 welds was missing delta ferrite values and/or signatures, the documentation for 4 welds was lacking the required preassignment of a delta ferrite hold point, and the documentation for 3 welds had delta ferrite values less than 3FN. These were rechecked and all were above 3FN. Ten welds were not checked after repair or being cut out. These are being checked now.

Review of finalized documentation revealed that of approximately 3,701 welds whose material thickness is 1/4" through 1", delta ferrite hold points were assigned to 535 welds. Of these, 469 welds were documented correctly, 54 have missing information, 12 had a delta ferrite value of less than 3FN.

These 12 welds were rechecked and delta ferrite values were 3FN or greater. The documentation for these welds has been corrected. The 54 hold points with missing information were marked not applicable because Process Specification 5.M.2.1(a) requires a sample of 250 welds be checked for this thickness range when the total number of welds is in the range from 3,500 to 10,000. We have checked 231 welds above this requirement.

Corrective Steps Taken to Avoid Further Noncompliance

To avoid the possibility of further insufficient document review before finalization, the Welding Engineering Unit is complying with revision 1 of Addendum 2 of WBN QCI 1.8. This revision provides for the development of a document review checklist by which all future and past submissions to the Quality Control and Records Unit will be given a detailed screening for accuracy and completeness.

Date of Full Compliance

TVA was in full compliance on September 11, 1981.