

TENNESSEE VALLEY AUTHORITY

USNRC REGION 3  
CHATTANOOGA, TENNESSEE 37412  
ATLANTA, GEORGIA

400 Chestnut Street Tower II

November 8, 1981  
81 NOV 25 P12: 20

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 - OIE INSPECTION REPORT  
50-390/81-03 AND 50-391/81-03 - FINAL RESPONSE ON VIOLATION  
50-390,391/81-03-02

The subject inspection report dated March 14, 1981 cited TVA for violation of NRC requirements. Responses to the violations were submitted on June 11, September 21, and September 30, 1981. Enclosed is our final response on violation 50-390,391/81-03-02. This response also addresses NRC's request for information dated June 27, 1981 and subsequent questions raised by Inspectors J. McDonald and D. Quick.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

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

8201270376 811224  
PDR ADOCK 05000390  
Q PDR

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
FINAL RESPONSE ON VIOLATION 50-390,391/81-03-02

Violation 50-390,391/81-03-02

10CFR50, Appendix B, Criterion V, requires activities affecting quality to be accomplished in accordance with instructions. The accepted QA program, FSAR Section 17.1A.5, states that assurance is provided that activities are accomplished in accordance with these instructions.

1. Westinghouse Field Change Notice (FCN) WAT 10529 and WBT 10521, Upper Head Injection Valve Modifications, required that the valve downstream disc have weld metal added to correct for body seat metal removal. The FCN's also required the work to be performed under the direction and supervision of an Anchor/Darling representative.

Contrary to the above, as of March 18, 1981, downstream valve discs did not have weld metal added in accordance with the FCN's. Also, the assigned Anchor/Darling representative did not direct and supervise the valve seat modifications for six of the eight valves.

2. WBNP-QCP-1.6, Section 6.6.2, required a responsible engineer during receipt inspection to ensure that all the required records accompanying or preceding material to the project were complete and comply with contractual requirements.

Contrary to the above, as of March 18, 1981, repair, inspection, and testing records completed as a result of FCN's WAT 10529 and WBT 10521, were not reviewed to ensure they complied with contractual requirements.

3. FCN WBT 10521 required a Westinghouse Quality Control release prior to shipment of the reworked valves from Anchor/Darling.

Contrary to the above, as of March 18, 1981, a Quality Control release was not provided on the reworked valves.

This is a Severity Level V Violation (Supplement II.E). Items similar to B.2 have been brought to your attention as items A.1 and A.4, in our letter of June 20, 1980, as items A, B, C, D, and F.2 in our letter of August 14, 1980, and as items A.2, A.3, and B.1 in our letter of October 9, 1980.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

## Response for Item 1

### Reason for the Violation

Westinghouse and Anchor/Darling conducted informal discussions concerning the modifications required to reduce seat scoring on the valves. During the course of these discussions it was decided that weld metal would be added to the wedges instead of the valve discs. Contrary to established procedure, these changes were not documented by revisions to the FCNs. This was due to an oversight on the part of Westinghouse. The modifications were performed by Anchor/Darling.

### Corrective Action Taken and Results Achieved

Westinghouse subsequently inspected the reworked valves at the site and issued a Westinghouse Quality Release. In addition, addendums have been issued to the original FCNs documenting that the welding of the wedges was acceptable. TVA has reviewed and accepted the FCN addendums.

### Action Taken to Prevent Recurrence

Westinghouse has committed to a review of the sequence of events surrounding this violation to ensure that their engineering, site, purchasing, and quality assurance personnel are alert to the need for proper control and documentation of modifications. This review will be complete by December 31, 1981.

### Date of Full Compliance

TVA is in full compliance.

## Response for Item 2

### Reason for the Violation

The cause of this item was a failure of personnel to properly implement WBNP-QCP-1.6 for the receipt of NSSS vendor equipment.

### Corrective Action Taken and Results Achieved

A review has been made of the documentation received on both unit 1 and 2 valves as a result of the implementation of FCNs WAT-10529 and WBT-10521. As a result of this review, NCR 3341R and NCR 3342R have been issued documenting this condition. Since TVA has received and accepted the Westinghouse FCN addendums, these NCR's have been dispositioned to use the valves as reworked by Anchor/Darling.

### Action Taken to Prevent Recurrence

Personnel involved in the receipt inspection of permanent material have been retrained to the requirements of WBNP-QCP-1.6.

### Date of Full Compliance

TVA is now in full compliance.

### Response for Item 3

#### Reason for the Violation

This item was due to an oversight on the part of the vendor. The QA review box on the second addendum to FCN WBT 10521 was not checked as it should have been.

#### Corrective Action Taken and Results Achieved

TVA initiated nonconforming condition report WBNNEB8103 pertaining to this deficiency. Westinghouse has subsequently inspected the reworked valves at the site and issued Quality Releases. These have been received by TVA.

#### Action Taken to Prevent Recurrence

Westinghouse has committed to a review of the sequence of events surrounding this violation to ensure that their engineering, site, purchasing, and quality assurance personnel are alert to the need for proper control and documentation of modifications. This review will be complete by December 31, 1981.

#### Date of Full Compliance

Having now received the Quality Releases, TVA is in full compliance.

#### Response to NRC Question on Violation 50-390,391/81-03-02 (July 27, 1981 letter)

Westinghouse and Anchor/Darling jointly determined the modifications that should be made to the subject valves. Dimensional buildup was determined from the gage-dimensions recorded on the FCN checklists and the stack up of parts on the disc wedge assembly. Tolerances were in accordance with Anchor/Darling standard assembly fitup. No NDE documentation was included in the documentation package since the wedges are nonpressure retaining parts. Upon learning that the unit 2 parts were returned without supporting Westinghouse Quality Releases, Westinghouse QA representatives examined the valves, determined acceptability of the work, and released the valves at the site.

The statement that rework of the subject valves was in accordance with the applicable FCN's was inaccurate. The statement was based on information provided by Westinghouse early in their investigation of the problem. At the time the statement was made, TVA was not aware of the discrepancies between the actual work and that specified in the FCN's. Upon identification of this discrepancy, TVA informed Westinghouse and requested that they provide a resolution to the discrepancy.