

TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

April 8, 1982 2 APR 15 1982 10

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-390/81-26, 50-391/81-24 - REVISED RESPONSE TO VIOLATION 50-390/81-26-04,
50-391/81-24-03

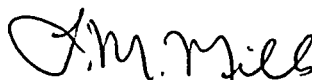
The subject inspection report dated December 23, 1981 cited TVA with four Severity Level V Violations in accordance with the provisions of 10 CFR 2.201. Our responses were submitted February 5, 1982. As discussed with R. V. Crlenjak by telephone on March 11, 1982, enclosed is our revised response to the subject violation. The reason for the revision is to change the date of full compliance from March 5 to March 25, 1982.

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. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE
WISBAR NUCLEAR PLANT UNITS 1 AND 2
REVISED RESPONSE TO VIOLATION

Violation 390/81-26-04, 391/81-24-03

10CFR50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented drawings of a type appropriate to the circumstances. The approved QA program, FSAR section 17.1A.5, commits to Safety Guide 28 which endorses ANSI Standard N45.2. Section VI of the standard contains the same requirements as does Criterion V.

Contrary to the above, as of November 23, 1981, activities affecting quality were not prescribed by drawings of a type appropriate to the circumstances in that the mechanical ductwork drawing notes (47W915 series) specified the use of construction specification G-39 for cleanliness control; however, G-39 did not contain cleanliness requirements for HVAC ductwork systems.

Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation

The drawing note in question concerning cleanliness, in accordance with G-39, does not make reference to ductwork. It is not intended that Construction Specification G-39 have cleanliness requirements for HVAC air handling and ventilation systems. However, Construction Specification G-37, referenced by system drawing 47W866-1, should have contained additional requirements for assuring air handling and ventilation system cleanliness.

Corrective Steps Taken and Results Achieved

An investigation revealed that G-37 is referenced on flow diagrams for other HVAC systems in addition to the system cited. TVA will revise G-37 to incorporate additional procedures for assuring air handling and ventilation system cleanliness. These procedures will require that air handling and ventilation systems be visually inspected for loose or foreign matter which could become airborne and collect on filters, coils or otherwise degrade components. The systems will be flushed for specific periods of time using installed fans and blowers. Flushing will be accomplished with filter and adsorber elements removed to assure maximum airflow. During flushing, existing balancing dampers will be utilized to block flows in various branches in order to maximize the flow in the branch being flushed. After flushing, dampers, coils, etc., will be visually inspected for foreign material.

For HVAC systems which have already passed the appropriate preoperational tests, the designers will work with the construction engineering organizations to assess the adequacy of cleanliness. TVA fully anticipates that the operation that has already been performed during construction and during balancing and testing has provided adequate flushing. If not already accomplished, the upstream faces of coils and dampers will be inspected through existing access ports.

The appropriate drawing note referenced in the violation concerning Construction Specification G-39 has been revised to clearly state that the requirements of G-39 do not apply to air handling and ventilation systems but only to piping shown on the drawings. In addition, TVA will revise G-39 to state that its requirements do not apply to air handling and ventilation systems. This will preclude future misinterpretations.

Corrective Steps Taken to Avoid Further Violations

Construction Specification G-37 will be revised to incorporate adequate procedures for assuring air handling and ventilation system cleanliness. Thus, all HVAC system drawings referencing G-37 will be provided with sufficient air handling and ventilation system cleanliness requirements.

Construction Specification G-39 will be revised to state that its requirements do not apply to air handling and ventilation systems. This will preclude future misinterpretations.

Date of Full Compliance

Both Construction Specification G-37 and G-39 will be revised and issued by February 12, 1982. Assessments of cleanliness on HVAC systems which have passed preoperational testing will be completed by March 25, 1982.