

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

1 HQ FILE COPY

March 29, 1982

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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
50-390/81-24, 50-391/81-22 - REVISED FINAL RESPONSE TO VIOLATION

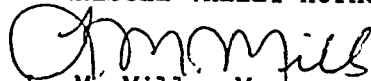
The subject inspection report dated November 18, 1981 cited TVA with one Severity Level V Violation in accordance with 10 CFR 2.201. Our initial response to this violation was submitted on December 22, 1981, and our final response was submitted on February 17, 1982. As discussed with R. V. Crlenjak by telephone on March 11, 1982, enclosed is our revised final response. The reason for the revision is to change the expected date of full compliance. The date was not met because of scheduling delays and insufficient manpower available for this work.

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

WATTS BAR NUCLEAR PLANT UNIT 1
REVISED FINAL RESPONSE TO VIOLATION

Violation 50-390/81-24-03

10CFR50, Appendix B, Criterion V, as implemented by Watts Bar FSAR Section 17, paragraph 17.1A.5, requires activities affecting quality be accomplished in accordance with instructions, procedures, or drawings. Watts Bar QCP-4.23R2, paragraph 6.6.4, requires that temporary or permanent removal of a documented or partially documented support shall be authorized by a "Support Removal-Reinstallation Sheet" issued by the Hanger Engineering Unit.

Contrary to the above, on October 27, 1981, activities affecting quality were not being accomplished in accordance with documented procedures in that the inspection of three piping hangers or restraints revealed partial disassembly or modification had been performed without the procedural authorization form.

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

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

This violation was caused by construction personnel circumventing an established quality assurance program for hanger installation and documentation.

This violation identified that hanger removals and alterations were being performed without following the proper procedure (QCP-4.23). Upon investigating this violation and 14 Nonconforming Condition Reports (NCRs) generated since January 1981, TVA has come to the conclusion that construction personnel were performing unauthorized, undocumented work.

Corrective Steps Taken and Results Achieved

Nonconformance reports have been written on the three subject hangers that were identified by this violation. These hangers have been reworked.

An extensive investigation was also performed to identify other hangers that might be in nonconformance. All such identified hangers have been documented appropriately and will be reworked by April 22, 1982.

Corrective Steps Taken to Avoid Further Violations

All construction personnel are continuously being instructed to adhere to the established quality assurance program for hanger installation and documentation. This is being accomplished by formal quality assurance training sessions, safety meetings, and informal groups' sessions. All construction personnel have the responsibility to report to their supervisor any finalized item that has been altered or removed. Specific action that has been or will be taken to prevent recurrence is as follows:

Hanger Engineering Inspection Personnel

1. Prior to these violations, there was a requirement placed in QCP-4.23R2, Appendix 2, Attachment D, as a reminder to the inspectors for checking bolts/nuts for handtightness. Hanger inspectors have been reinstructed in this requirement.
2. Inspectors for the Hanger Engineering Unit have been issued torque stripping to aid all construction personnel in identifying hangers which have been finalized since December 1981.
3. All NCRs written on future items of this type will be thoroughly investigated by engineering personnel to determine cause and appropriate action taken.

Trades and Labor (Craft) Personnel

1. All NCRs written on future items will be thoroughly investigated by the Construction Superintendent's Office to determine cause and appropriate corrective action.
2. Craft foremen have been instructed to check their crews' work areas daily and report to their supervisor any alteration of finalized features.
3. Any craft personnel who willfully violates a QA procedure will receive disciplinary action.

Date of Full Compliance

The hangers identified during the investigation resulting from this deficiency will be reworked by April 22, 1982.