

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

August 26, 1982 AID: 03

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

TE HQ FILE COPY

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - OIE INSPECTION REPORT
50-390/81-03 AND 50-391/81-03 - SUPPLEMENTAL RESPONSE TO 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. Our final response on violation 50-390,391/81-03-02, which addressed the NRC's request for information dated June 27, 1981 and subsequent questions raised by Inspectors J. McDonald and D. Quick, was provided on November 19, 1981.

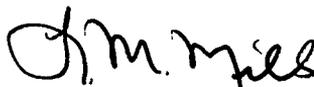
Subsequent clarification and requests for information have been received informally from the NRC resident inspector. This supplemental response is submitted to address those additional concerns.

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 Licensing

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 UNITS 1 AND 2
SUPPLEMENTAL RESPONSE ON VIOLATION 50-390,391/81-03-02

Item 1:

Should modification work done on unit 2 UHI valves have been witnessed and reported by TVA's inspection and testing personnel? Unit 1 valves were inspected and a report was filed.

Response:

TVA's engineering procedures and the NSSS contract assign the primary responsibility for shop inspection to Westinghouse. TVA has oversight responsibility and may at its discretion make such reviews, inspections, and modifications as deemed necessary. Therefore, inspection of the unit 2 valves by TVA personnel was not required. Similarly, TVA's inspection of the unit 1 valves was within the scope of the applicable engineering procedures and contractual arrangements. However, such inspection or lack of inspection by TVA does not relieve Westinghouse of the primary responsibility for inspection.

Item 2:

It appears that neither unit 1 nor unit 2 valves were retested after modification. Original I&T reports stated that the valves were stroked, hydrostatically tested, and checked for seat tightness. Since modifications were done to the seat rings, discs and wedges, it would appear that retest requirements should have been specified and conducted.

Response:

- a. Seat leakage criteria in the original manufacturing specification were not ASME code requirements. Therefore, retest for seat tightness is not a code requirement. However, assurance that an adequate seal can be established upon valve closure is important from a systems operation standpoint. Excessive leakage across the seat of the two series valves could result in a continued low level of injection into the primary system postaccident. Therefore, Westinghouse has agreed to provide revised startup test documents incorporating retest requirements to verify acceptable disc-to-seat seal.
- b. Leak integrity of the body to bonnet joint will be verified prior to startup under terms of ASME Section XI.

Item 3:

Several parts of the TVA response to violation 81-03 do not address concerns raised in the report.

Response:

It is expected that supplementary information provided in this revised response will adequately address all concerns not previously addressed.

Item 4:

Documentation is conflicting concerning the actual modifications performed. Does TVA or Westinghouse have shop travelers, etc. that actually verify modification work?

Response:

Both unit 1 and unit 2 valves were inspected and released by a Westinghouse quality assurance representative. These releases were based on inspection of related valve components and review of pertinent documentation, e.g. shop travelers. Acceptability of the modifications, i.e. component tolerances, will be confirmed by successful completion of the seat leakage retest, discussed in item 2 above.

Item 5:

Documentation is conflicting/unclear on PT requirements for discs and wedges. Do welding or cutting operations require PT?

Response:

Seat rings and valve discs were inspected by liquid penetrant method. This is documented on the Anchor Darling shop travelers and the Westinghouse quality release. Rework of the wedges was inspected by Anchor Darling as noted on their shop traveler. No specific NDE procedures were required since the wedges are not pressure boundary components.

Item 6:

TVA memorandum (NEB 81022 7250) stated in part that both quality releases would specify the same level of quality assurance. All discs were inspected and released for unit 1 valves. Only two discs were inspected on unit 2. The amount of documentation available to the Westinghouse inspector has not been ascertained.

Response:

The Westinghouse quality assurance representative who released the unit 2 valves stated in conversations with a TVA representative that release was based upon review of the documentation provided by Anchor Darling on all the modified components e.g. shop travelers, dimensional checks, and visual inspection of the discs from two of the valves. Westinghouse quality control procedures require that documentation of modifications be reviewed, but visual inspection of all modified components is not necessary.