



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381

OCT 11 1991

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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

In the Matter of the Application of) Docket No. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NO 50-390/89-200 -
REVISED RESPONSE TO NOTICE OF VIOLATION

Further evaluation and root cause analysis of the deficiency identified
in Example 2 of Violation A has resulted in a revised corrective action
plan for Significant Corrective Action Report (SCAR) WBN 900175SCA
(formerly, Condition Adverse to Quality Report [CAQR] WBN 900175).

Enclosed is TVA's revised response to Example 2 of Violation A of the
subject notice of violation. As discussed in the enclosure, TVA admits
that Example 2 of Violation A involves a noncompliance with regulatory
requirements with some additional clarification.

Also, a statement provided in the July 19, 1991 letter regarding
Violation A, Example 1, requires clarification.

No new commitments have been identified in this letter.

If there are any questions, please telephone P. L. Pace at (615) 365-1824.

Sincerely,

John H. Garrity

Enclosure

Handwritten initials/signature

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U.S. Nuclear Regulatory Commission

OCT 11 1991

cc (Enclosure):

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ENCLOSURE

REVISED RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-390/89-200

Description of Violation A, Example 2

10 CFR 50, Appendix B, Criterion X, requires, in part, that a program for inspection of activities affecting quality be executed by or for the organization performing the activity to verify conformance with the documented instruction, procedures, and drawings for accomplishing the activity.

Contrary to the above, the following deficiencies in TVA's quality control inspection program were identified:

* * *

2. Quality Control records used by electricians and inspectors for wiring installation referenced an uncontrolled specification. QC records for control board wiring referenced Westinghouse Specification 953267. Both documents were required to complete the installation. The Westinghouse specifications was not within TVA's program for controlled documents.

* * *

This is a Severity Level IV violation (Supplement II) and applies to Unit 1.

Admission or Denial of Violation A, Example 2

TVA admits that Example 2 cited in Violation A involves a noncompliance with regulatory requirements. However, TVA considers some additional clarification to be necessary.

Reason for Violation A, Example 2

Westinghouse procurement E-Specification (E-Spec) 952367 provides vendor specifications in the same manner as a vendor manual or vendor drawing. Like vendor manuals and vendor drawings, the E-Spec was approved and controlled as vendor information in accordance with Nuclear Engineering Procedure NEP-4.1, "Procurement." The E-Spec provided the vendor's as-built configuration of the main control panels and, in accordance with NEP-4.1, was not required to be maintained as an issued engineering specification after the as-built configuration is established.

As required when performing maintenance or modification of any vendor-supplied equipment, the vendor manual (in this case the E-Spec) was required to provide the detailed engineering specifications that are not included in TVA output documents. The example associated with the subject deficiency was the specification of Teflon tubing material for insulating the panel drain wires. This level of detailed specification was not originally included in the TVA design output drawing.

Reason for Violation A, Example 2 (continued)

The uniqueness of the control room panel configuration and the subject E-Spec may have contributed to this misunderstanding of the involved personnel.

Failure of the involved personnel to recognize the E-Spec as required vendor specifications for design attributes not specified on TVA drawings resulted in the original hardware deficiency where PVC tubing was installed on the panel drain wires instead of the vendor required Teflon tubing.

Failure of the involved personnel to recognize the E-Spec as controlled vendor information resulted in the misidentification of its reference on workplan data sheets as a deficiency.

Corrective Steps Taken and Results Achieved

TVA has determined that the uniqueness of the control room panel configuration and the subject E-Spec limits this deficiency to this occurrence. Hardware problems related to this issue have been corrected and documented in Condition Adverse to Quality Reports WBP 890429 and 517. As additional clarification of this E-Spec requirement, TVA has revised the applicable design output drawing to include the required information from the E-Spec.

The work control issues described in the reason for violation section above are typical of the problems which led to the issuance of Stop Work Order WB-90-01. These issues are being addressed as part of TVA's management objectives for restart of construction at WBN. TVA/NRC meetings held on April 12, June 27, and August 5, 1991, addressed these objectives for restart. Subsequent TVA/NRC meetings and NRC inspections are planned for the various activities affecting restart of construction. As discussed in the NRC Region II letter dated January 18, 1991, implementation of these actions will be demonstrated by TVA in order to obtain NRC concurrence to restart construction activity.

Corrective Steps Taken to Avoid Further Violation

The corrective actions regarding work control issues are being addressed as part of TVA's management objectives for restart of construction at WBN. These management objectives will be completed and available for review and concurrence prior to resumption of major construction activities.

Date When Full Compliance Will Be Achieved

TVA will be in compliance with those actions identified above prior to restarting major construction at WBN.

Clarification of Statement Made In Letter Dated July 19, 1991

On July 19, 1991, TVA submitted a letter to revise or clarify previous commitments or statements made by TVA as part of an effort to improve the WBN work control process and adopt the Browns Ferry Nuclear Plant's Automated Workplan Control Program. In the section of that letter concerning Violation A, Example 1, the following is stated in Item 3 under the clarification section:

"The new Modification and Addition Instructions (MAIs) contain minimum inspection points as established in the model inspection plans for the individual work activity. The Inspection Report is now considered an internal QA document for trending purposes and the data sheets and work instruction signoffs contained in the workplan are considered the QA record of inspection."

In order to further clarify the method of inspecting and documenting the acceptance of components and features in the new modification process, this statement is being changed as follows:

The new Modification and Addition Instructions (MAIs) contain minimum inspection points for the individual work activity. The MAI data sheet provides the minimum attributes for the inspector to check. A signature on the data sheet and a cross-reference to the Inspection Report (IR) signifies acceptance. The IR will document all satisfactory and unsatisfactory items and provide a means of tracking unsatisfactory IRs to closure. The IR and data sheet are both cross referenced to the work implementing document and the affected component. The IR will also provide trending information.