



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

DEC 03 1990

Mark O. Medford  
Vice President, Nuclear Assurance, Licensing and Fuels

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

In the Matter of the Application of )  
Tennessee Valley Authority ) Docket Nos. 50-390

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NO. 50-390,  
391/90-14 - SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION 390/90-14-01

The enclosed response supplements TVA's September 11, 1990 response to the notice of violation. The supplemental response addresses two NRC concerns as requested in a letter to O. D. Kingsley, Jr., from Bruce A. Wilson dated November 2, 1990. These concerns relate to Example 1 of the violation regarding pressurization of fire protection piping above system design pressure.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark O. Medford

Enclosure  
cc: See page 2

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U.S. Nuclear Regulatory Commission

DEC 03 1990

cc (Enclosure):

Ms. S. C. Black, Deputy Director  
Project Directorate II-4  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

NRC Resident Inspector  
Watts Bar Nuclear Plant  
P.O. Box 700  
Spring City, Tennessee 37381

Mr. P. S. Tam, Senior Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

Mr. B. A. Wilson, Project Chief  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

ENCLOSURE

SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION  
390/90-14-01

NRC Concern 1

Provide a discussion as to extent of condition (i.e., a review of other surveillance procedures which were modified to gain pump performance data).

TVA Response

TVA determined that surveillance instructions (SIs) for ASME Section XI pumps and fire protection pumps may have been used in the past to obtain pump performance data. These SIs pertain to the systems listed in Table 1. TVA determined there had been approximately 106 instruction changes (ICs) to these SIs since the SIs were initially issued. A review of these ICs (some issued as early as 1984) confirmed only one additional example of an instruction which had been improperly modified to obtain pump performance data. This example, IC-89-049, was issued against SI-7.50, "High Pressure Fire Protection Pumps," and was performed in 1989 to obtain pump performance data in the same manner as IC 90-200, the IC discussed in the subject violation. Problem Reporting Document (PRD) WBP900290P was issued in June 1990 to document that design pressure was exceeded during performance of both ICs. The corrective action discussed in reply to the notice of violation is applicable to IC-89-049 as well as IC-90-200.

NRC Concern 2

Provide the new piping design pressure and information on implementation of the design pressure change including the requirements for hydrostatic testing.

TVA Response

As discussed in TVA's reply to the notice of violation, the design pressure of the high pressure fire protection (HPFP) test line was to be revised. Under approved Design Change Notices (DCNs) P-00507-A, P-00508-A, F-14040-A, and F-14041-A, the design pressure of the train A and B test lines was raised to 200 psi. Implementation of these DCNs requires that the test lines be hydrostatically tested to 300 psi. The DCNs are presently design complete and approved for field implementation.

TABLE 1

<u>SYSTEM</u>	<u>DESCRIPTION</u>
3	Main and Auxiliary Feedwater
18	Diesel Generator Fuel Oil
26	High Pressure Fire Protection (HPFP)
62	Chemical and Volume Control
63	Safety Injection
67	Essential Raw Cooling Water
70	Component Cooling
72	Containment Spray
74	Residual Heat Removal

Systems for which SIs may have been used to obtain pump performance data.