



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

John H. Garrity
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OCT 02 1991

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

Gentlemen:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NO. 50-390,
391/90-14 - REVISED RESPONSE TO NOTICE OF VIOLATION 390/90-14-02

The purpose of this letter is to revise TVA's September 11, 1990 response to the subject notice of violation. The original violation involved instances wherein, contrary to Section 6.3.2 of Administrative Instruction (AI)-7.1, maintenance personnel deleted quality control (QC) holdpoints from identified work instructions without obtaining an engineering evaluation or Quality Assurance (QA) concurrence. As a corrective action, TVA resolved an inconsistency in procedures governing the disposition of nonapplicable data blanks to make it clear that plant maintenance personnel were required to obtain a plant engineering evaluation and QA concurrence prior to deleting a QC holdpoint.

On several occasions since the time of our response, situations have arisen which makes the practice of obtaining prior QA concurrence unduly burdensome without providing any corresponding QA benefit. Enclosure 1 to this letter describes the nature of the problem encountered and the need for TVA to modify its QC holdpoint disposition procedures. These new procedures will provide that, under limited circumstances, maintenance personnel may delete a QC holdpoint without obtaining QA concurrence, when the work control document allows a certain task to be bypassed and the QC holdpoint is contained in that bypassed task. Enclosure 2 contains the commitment made in this submittal.

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U.S. Nuclear Regulatory Commission

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If you have any questions, please telephone P. L. Pace at (615) 365-1827.

Sincerely



John H. Garrity

Enclosures

cc (Enclosures):

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ENCLOSURE 1

REVISED CORRECTIVE ACTION IN RESPONSE
TO VIOLATION 390/90-14-02

Violation 390/90-14-02 occurred as the result of an inconsistency between procedures dealing with the method for dispositioning nonapplicable quality control (QC) holdpoints. Administrative Instruction (AI)-7.1 required a plant engineering evaluation and Quality Assurance (QA) concurrence before an attribute/holdpoint could be marked "N/A." NRC found instances, however, where maintenance craft used AI-3.11 which allowed procedural steps to be marked "N/A" so long as they were initialed and dated by the responsible individual.

AI-3.11 was revised as part of TVA's original corrective action to be consistent with the requirements of AI-7.1 (AI-3.11 and AI-7.1 have been replaced by Site Standard Practices [SSPs]-2.03 and -3.01, respectively) for QC holdpoint dispositioning, i.e., plant engineering evaluation and QA concurrence. However, in many instances a work control document is written to cover a variety of tasks rather than one specific task and must be structured in a way that allows maintenance personnel to bypass the performance of unnecessary steps. As an example, an instruction pertaining to motor maintenance may require the oil level to be checked and, if the level is low, oil of a particular type to be added to a specified level. As part of the instruction, a QC holdpoint requires QA/QC to verify the type and amount of oil added. Under the holdpoint disposition procedures as they were revised in response to Violation 390/90-14-02, even if the oil level was acceptable and the QC holdpoint for verification of added oil obviously did not apply, maintenance personnel had to obtain QA concurrence to "N/A" this particular holdpoint.

To eliminate unnecessary delay and hardship imposed on both maintenance personnel and QA/QC staff, WBN is amending its QC holdpoint disposition procedures to allow plant engineers or planner personnel to "N/A" QC holdpoints without QA concurrence in those instances when the work control document allows a certain task to be bypassed and the QC holdpoint is contained in that bypassed task. The holdpoint disposition procedures will still require maintenance personnel to obtain plant engineering evaluation and prior QA concurrence before deleting QC holdpoints that are not contained within a bypassed task.

ENCLOSURE 2

LIST OF COMMITMENTS

WBN is amending its quality control (QC) holdpoint disposition procedures to allow plant maintenance personnel to "N/A" QC holdpoints without Quality Assurance concurrence, when the work control document allows a certain task to be bypassed and the QC holdpoint is contained in that bypassed task.