



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

John A. Scalice
Site Vice President, Watts Bar Nuclear Plant

NOV 18 1996

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - NRC INSPECTION REPORT NO. 50-390, 391/96-10 - REPLY TO NOTICE OF VIOLATION (NOV)

The purpose of this letter is to provide a reply to NOV 50-390/96-10-02 identified in the subject inspection report dated October 17, 1996. This notice of violation identified that one of the low pressure steam trap valves associated with the turbine driven Auxiliary Feedwater System pump was not properly positioned in accordance with the applicable configuration control procedure. TVA's reply is provided in the enclosure.

TVA has reviewed NRC comments regarding recent configuration control and site security issues in the subject inspection report. As discussed in the TVA/NRC management meeting in the Region II office on October 29, 1996, these are key focus areas for WBN management. In the configuration status control area, WBN continues to address individual errors through personnel actions, while at the same time developing innovative approaches to prevent these events from happening. Meetings have been held with personnel from the other TVA operating sites to discuss common configuration control issues and take advantage of the lessons learned at each site. Although the WBN events to date have not been serious safety issues, WBN sees these events as precursors which must be promptly and effectively addressed.

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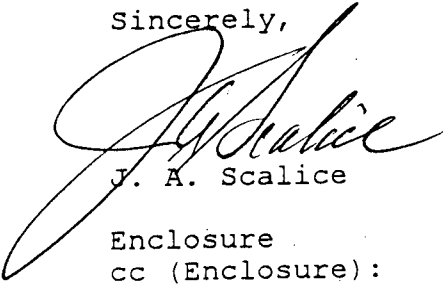
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With an increased level of management focus, we are now beginning to see improvement in the review and analysis of security issues. A more detailed discussion on security issues will be provided in WBN's response to inspection report 50-390, 391/96-12 when issued.

If you should have any questions, please contact P. L. Pace at (423) 365-1824.

Sincerely,



J. A. Scalice

Enclosure

cc (Enclosure):

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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNIT 1
REPLY TO NOTICES OF VIOLATION
NOV 50-390/96-10-02

NOTICE OF VIOLATION 50-390/96-10-02

"Technical Specification 5.7.1.1 requires that written procedures shall be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. This includes procedures required for the operational alignment of safety-related equipment.

Watts Bar System Operation Instruction (SOI)-3.02, Auxiliary Feedwater System (AFW), Revision 21, Checklist 3, requires the status of isolation valve 1-ISV-3-951 to be open during normal operations.

Contrary to the above, as of September 10, 1996, low pressure steam trap downstream isolation valve 1-ISV-3-951 for low pressure steam trap 1-TRAP-3-936 was closed and was not tracked by any configuration control process for being out of its required position. Isolation of the low pressure trap could potentially degrade the removal of steam condensate from the auxiliary feedwater pump turbine supply line."

TVA RESPONSE

TVA agrees that this violation occurred.

REASON FOR THE VIOLATION

The root cause of this condition could not be determined. Personnel performing the root cause analysis investigated hold orders, work activities that might have manipulated the valve, inspections in the immediate area, associated procedures, interviews with assistant unit operators (AUOs) and other plant support personnel cognizant of work activities in the area and activities involving routine (shift) blowdown of the steam traps. The most probable cause has been attributed to incidental contact with the valve during routine blowdown of the steam traps. During this process, personnel work in cramped conditions and wear heavy protective clothing due to working in close proximity to hot steam pipes. These conditions increase the possibility of inadvertently bumping a valve from its required position. This is especially true for 90 degree valves like the one discovered out of position in the subject violation.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

Valve 1-ISV-3-951 has been placed in the required open position for normal operation. This valve and the parallel drain trap valve have been independently verified as being in the correct position.

A valve alignment has been performed by checklist for AFW components located between the AFW turbine driven pump and the associated valve vault room. No additional valves were found mispositioned.

During performance of the above alignment, WBN discovered that the procedure checklist indicated the wrong position for valve 1-VTV-3-923; however, the valve was found in the correct position. WBN determined that the checklist error had been introduced by procedure revision since the last time the checklist was used. The checklist has since been corrected for valve 1-VTV-3-923.

The accuracy of the valve checklist was later verified by performing a comparison review between the checklist and design output. No additional valve configuration inconsistencies were identified on the checklist.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

A site bulletin has been issued, dated September 26, 1996, to emphasize individual employee expectations for maintaining status control. In an effort to minimize the frequency and/or reduce the potential impact of such occurrences, guidance was provided as to what actions to take if plant equipment is inadvertently contacted. Additionally, the importance of avoiding unnecessary contact with plant equipment was emphasized.

Increased management emphasis to resolve similar configuration control issues has been discussed in TVA's response to inspection report 50-390, 391/96-09.

A trending Problem Evaluation Report (PER) has been initiated to evaluate site configuration control issues under the WBN Corrective Action Program process.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the subject violation, TVA is in full compliance.