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O. J. "Ike" Zeringue
Senior Vice President, Nuclear Operations

OCT 13 1995

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - NRC INSPECTION REPORT NO.
50-390, 391/95-63 - REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of Violation 50-390/95-63-01 identified in the subject inspection report dated October 4, 1995. This violation concerns the failure to identify and document a condition adverse to quality in the corrective action program.

The enclosure contains TVA's reply to the notice of violation. No new commitments are made in this letter.

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

Sincerely,


O. J. Zeringue

Enclosure
cc: See page 2

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cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1
NRC INSPECTION REPORT NO. 50-390/95-63
REPLY TO NOTICE OF VIOLATION

Notice Of Violation 50-390/95-63-01

"10 CFR 50, Appendix B, Criterion XVI, and TVA Nuclear Quality Assurance Plan TVA-NQA-PLN89A, Revision 4, require in part that measures be established to assure that conditions adverse to quality, such as deficiencies and nonconformances are properly identified and corrected in accordance with documented plans, and corrective actions shall be verified and documented by the appropriate organization. The measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Site Standard Practice SSP-3.04, Corrective Action Program, Revision 14, paragraph 2.1, requires that an initiator report adverse conditions or potential conditions, promptly, to their supervisor in accordance with the appropriate corrective action program document.

Contrary to the above, from January 24, 1995 to August 28, 1995, the applicant failed to identify and document a condition adverse to quality in the corrective action program in that a significant portion of the work associated with safety-related conduit support calculation D1872407-12-F23420A had been performed by the same individual that had signed as having performed the independent verification function for that calculation. The applicant should have identified this condition as a condition adverse to quality based on information contained in TVA Employee Concern File ECP-94-WB-791-F1."

TVA Response

TVA concurs with the violation.

Reason For The Violation

1. The reason for the failure to identify and document the condition adverse to quality was personnel error. The Concerns Resolution Staff (CRS) specialist was very familiar with the requirements of TVA's corrective action program but failed to recognize the subject condition adverse to quality.
2. The condition adverse to quality was caused by contractor personnel failing to follow procedure. Raytheon Engineering & Construction Co. Procedure E-76-TVA, Revision 8, defines an independent verifier as a competent individual, regardless of classification, who shall review, confirm, or substantiate design outputs, and who shall not have performed the design.

Conduit support calculations address variances to typical conduit supports and address each variance independently, drawing its own conclusion. Different sections of the subject calculation were prepared by different individuals at the same time. The "preparer" responsibilities for one section were then assumed by another individual who initialed the sheets as the "preparer." The first individual, who actually developed

this section, subsequently performed the check and design verification, and initialed the sheets as the "checker." Since the involved individuals are no longer onsite, TVA cannot specifically determine why procedures were not followed.

Corrective Steps That Have Been Taken And The Results Achieved

1. CRS File ECP-94-WB-791-F1 has been re-opened to document the NRC finding and TVA's resolution.
2. A search of the CRS database identified 18 other files which had been investigated by the same CRS specialist that investigated ECP-94-WB-791-F1. A review of those files determined that no similar deficiencies existed.
3. Based on a review of 524 calculations, TVA determined that the instances where calculations had not received proper independent review were limited to conduit support calculations prepared by the System Completions Department, Civil Engineering Group. Of the 18 additional calculations identified during this review as having the subject condition, varying involvements of five individuals were noted in each document. No similar conditions were identified involving different personnel in conduit support variance calculations or outside the Systems Completion Department, Civil Engineering Group, including other disciplines and other type calculations. The review results indicate that the condition was limited to calculations prepared or checked/verified by five individuals.
4. An independent design verification has been performed on each of the 19 affected conduit support variance calculations (this number includes the example identified by NRC). In each case, the original conclusions were found to be valid and the acceptability of the designs confirmed. Minor changes, not impacting the calculation conclusions, were made to some calculations for clarity and accuracy.

Corrective Steps That Will Be Taken To Avoid Further Violations

1. The CRS specialist that investigated File ECP-94-WB-791-F1 no longer works at TVA. Therefore, no further actions can be taken with respect to this individual.
2. CRS Instruction 1 has been reviewed for adequacy with regard to initiation of conditions adverse to quality. No changes to CRS Instruction 1 are necessary.
3. A "lesson learned" session has been conducted for CRS Site Representatives and Specialists concerning the subject notice of violation.
4. The five individuals associated with the subject calculation no longer work at TVA. Therefore, no further actions can be taken with respect to these individuals.
5. Raytheon discipline leads and applicable discipline engineers have been made aware of the subject notice of violation.

Date Full Compliance Will Be Achieved

With regard to the cited violation, TVA is in full compliance.