



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

NOV 01 1995

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) UNITS 1 AND 2 - NRC INSPECTION REPORT
NOS. 50-390/95-69 AND 50-391/95-69 - REPLY TO INSPECTION ITEMS

The purpose of this letter is to provide a reply to two items associated with the disposition of walkdown discrepancies identified during the subject inspection. One item concerns the incorrect disposition of a walkdown discrepancy as "item no longer exists in the field." The second item concerns the failure to add a walkdown discrepancy (bent hanger rod) to the Discrepancy Log as an item that required disposition.

The enclosure contains TVA's reply to the two subject items. No new commitments are made in this letter.

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

Sincerely,

R. R. Baron
Nuclear Assurance and
Licensing Manager (Acting)

Enclosure
cc: See page 2

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cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
INSPECTION REPORT NOS. 50-390/95-69 AND 50-391/95-69
REPLY TO INSPECTION ITEMS

Inspection Items

1. A discrepancy identified during walkdowns performed in accordance with Modifications/Additions Instruction (MAI)-1.9, "Walkdown Verification for Modifications System/Area Completion and Damaged, Loose or Missing Hardware," was incorrectly dispositioned as "item no longer exists in the field." Specifically, a broken one-hole strap clamp at a conduit support (no identification number) was identified as Item #264 in Appendix D to MAI-1.9 for the Mechanical Equipment Room (Room C401). The noted discrepancy still exists in the field.
2. A colored grooming ribbon was placed on a bowed hanger rod in the Intake Pumping Station (Room I102) during the MAI-1.9 walkdowns. This ribbon was not identified on the Appendix D Discrepancy Log as an item that required a disposition.

TVA Response

TVA concurs that the items occurred.

Reason For The Inspection Items

1. The apparent cause for the first item is personnel error. Although the actual discrepancy evaluator could not be ascertained, Item #264 was probably field reviewed from the location provided on the Discrepancy Log. That location should have been sufficient to locate the item in the field. The evaluator apparently could not locate the item and dispositioned the item as "item no longer exists in the field." The evaluator failed to self-check to ensure the correct component was being evaluated.
2. The apparent cause for the second item is personnel error. Although the actual individual that hung the ribbon on the support could not be ascertained, that individual did not properly record the discrepancy on the Discrepancy Log. The responsible individual failed to self-check to ensure that the intended action (recording the discrepancy) was performed.

The ribbon hung from the support simply said "bent rod" with no discrepancy number written on the ribbon. The MAI-1.9 walkdown overlooked the ribbon during the final walkdown because Startup and Test had hung other ribbons in the vicinity of the bowed rod for work on a strainer. Those ribbons did not have MAI-1.9 discrepancy numbers written on them either.

Corrective Steps That Have Been Taken and the Results Achieved

Example 1: The discrepancy logs for Seismic Category I structures have been reviewed. A total of 3127 items (including the NRC identified example) were identified as having a disposition of "item no longer exists in the field," "no work required" with no explanation, "no problem found" or any other disposition that would be questionable as to the actual disposition.

The identified items were categorized as follows:

Design Buyoff - 932 items were determined to be acceptable by the item being encompassed by another program (e.g., Penetration Seal Program or Cable Tray Program) or by design output.

No Work Required - 1984 items were verified to have been correct as dispositioned in the discrepancy log (i.e., for "no problem found", the problem identified in the discrepancy log had been corrected).

Rework In-Scope - 111 items (including the NRC identified item) were determined to still exist in the field and required rework to correct the discrepancy. The rework for these items is complete.

Rework Out-of-Scope - 59 original dispositioned items were determined to have been corrected. However, another discrepancy was noted with the item or the same discrepancy existed but was determined to have been caused after correction of the original discrepancy. These discrepancies have been corrected.

Cannot Locate/No Access - 41 items were located in areas which are no longer accessible or the location of the item described could not be ascertained. These items have been reviewed by Nuclear Engineering and have been determined to either have no safety significance or will not impair the operability or function of the equipment.

The MAI-1.9 walkdown packages have been supplemented to reflect the correct disposition of the above items.

Example 2: A review of the Intake Pumping Station found no other ribbons identifying discrepancies not recorded on the MAI-1.9 Discrepancy Log. Therefore, this condition is considered to be isolated. Support H-206-2-300-5 has been corrected by Work Order 95-22292-41. No other corrective actions are required.

During a NRC walkdown of the Unit 1 containment building, two colored ribbons were also found. Both discrepancies were verified to have been captured in the MAI-1.9 Discrepancy Log. TVA verified that both discrepancies had been properly dispositioned prior to the removal of the ribbons.

Corrective Steps That Will Be Taken

The individuals that dispositioned the item incorrectly and hung the ribbon on the bowed rod could not be ascertained. Additionally, the MAI-1.9 walkdowns for Seismic Category I structures are complete. Therefore, no recurrence controls are required.

Date Full Compliance Will Be Achieved

With regard to the identified inspection items, TVA is in full compliance.