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John A. Scalice
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JUL 01 1996

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - NRC INSPECTION REPORT NO.
50-390/96-07 - REPLY TO NOTICES OF VIOLATION

The purpose of this letter is to provide a reply to Notices of Violation (NOV) 50-390/96-07-01 and 50-390/96-07-02. Violation 390/96-07-01 concerns the failure to maintain a protected area barrier in accordance with regulatory requirements and NOV 390/96-07-02 concerns the failure to maintain dual barriers for vital equipment. TVA's reply to these violations is provided in Enclosure 1 of this letter. Enclosure 2 provides the list of commitments being tracked by this letter.

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

Sincerely,



J. A. Scalice

Enclosures
cc: See page 2

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1 AND 2
REPLY TO NOTICE OF VIOLATION (NOV)
NOV 50-390/96-07-01
NOV 50-390/96-07-02

DESCRIPTION OF VIOLATION 50-390/96-07-01

"The licensee's Physical Security Plan, Chapter 4, paragraph 4.1(I), Revision 0-P, dated March 4, 1994, states that "penetration resistance equal to that of the overall PA barrier is provided for any culverts, ditches, and other man-sized penetrations through or under the PA barrier. Man sized is defined as greater than 96 square inches with the least dimension greater than 6 inches."

Administrative Order 2.9(c), Interior Motor Patrol, Revision 2, dated April 26, 1996, states "physical barriers including yard drains/manhole covers, will be inspected while on patrol. Any penetrations or signs of attempted penetrations shall be immediately reported to CAS/SAS."

Administrative Order 2.16, Security Equipment Maintenance Testing, Revision 4, Dated March 11, 1996, paragraph 4.0, states "each inspection is to ensure there are no discrepancies in the protected or vital area barriers which might potentially degrade the security of the plant. All drain grills and barrier gratings are to be secured in place. The inspections are to be conducted each seven days."

Contrary to the above from January 1996 to March 22, 1996, the licensee failed to maintain penetration resistance equal to that of the overall protected area barrier for culverts and pipes that could afforded unauthorized access to the protected area. Additionally, from January 1996 to February 1996, the licensee had conducted and documented inspections of the culverts and drains which should have resulted in the discovery of the insecure openings."

TVA RESPONSE

TVA agrees that the violation occurred.

REASON FOR VIOLATION

This violation occurred because Nuclear Security management failed to provide adequate Administrative Orders (AO) that address the specific processes required to identify damage/construction impacts to drain barriers. Thus, the Nuclear Security officers failed to recognize potential impacts to the yard drainage system. AO-2.16 and AO-2.9 did not address special fastener attributes associated with drains and culverts; therefore, Nuclear Security officers were not aware of the required securing method or total number of drains to be verified. The Nuclear Security procedure, "Compensatory Measures/Administrative Controls" (AO-2.10), did not address that the existence of a potential barrier degradation should immediately be

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compensated for until verification that a barrier opening exist. In lieu of appropriate compensatory measures, an increased roving patrol was established.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Nuclear Security personnel assigned the responsibility to perform the requirements of AO-2.16, Appendix G, and AO-2.9 were counseled on the need for increased attention to the physical condition of interior drains and establishing compensatory measures immediately upon discovery of a potential security degradation of any type. This message was also conveyed by memorandum to the Nuclear Security management and supervisors.

The drains and culverts inside the Protected Area have been walked down to identify any additional damage/degradation problems. Eleven drains/openings with varying states of improper configuration or deficiencies that were related to security requirements were identified during this comprehensive walk down. Nine of the 11 drains have been repaired with the proper fasteners. Two openings have been temporarily modified to preclude entry. The temporary modification will later be replaced by a permanent modification.

Members of the Facilities organization were issued a memorandum as a reminder that some drains and manholes are security barriers and care should be taken not to damage yard drainage fasteners or remove fasteners without informing Nuclear Security prior to removal. If damage occurs, Nuclear Security should be immediately notified.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

AO-2.16, Appendix G was revised to include guidance as to specific drain locations to promote systematic check-off. A sketch that identifies the location of the drains/openings inside the protected area barrier was also placed in AO-2.16.

AO-2.9 was revised to include a sketch of interior drains, and to include the yard drains/manhole covers as one of the physical barriers to inspect while on routine patrol.

AO-2.10 was revised to note that whenever a potential barrier degradation is identified or discovered, appropriate compensatory measures will be immediately taken, until a determination is made as to the validity of the finding.

In addition, to assist in maintaining penetration barriers, Business Practice (BP)-354, "Facilities Work Request and Preventive

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Maintenance Job Ticket," is being revised to notify Nuclear Security prior to performance of any work on the yard drainage system.

DATE WHEN IN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the cited violation, TVA is in compliance. The permanent modification and the procedure revision discussed above will be complete by September 15, 1996.

NOTICE OF VIOLATION 50-390,391/96-07-02

"The Licensee's Physical Security Plan, Chapter 4, paragraph 4.2, Revision 0-P, dated March 4, 1994, states that "vital equipment is located within a VA, which in turn is located within the PA such that access to vital equipment requires passage through at least two physical barriers of sufficient strength to meet the performance requirements of 10 CFR 73.55(a)."

Site Standard Practice, SSP-6.02, Revision 16, paragraph 2.2.4 E, requires work requests to be reviewed for security equipment removal from service or breaches in protected or vital area barriers and to ensure physical security instruction, PHYSI-15, "Procedures for Removing Security Equipment from Service and/or Administrative Controls" is followed and security notified.

Contrary to the above on April 29, 1996, from approximately 10:10 a.m. to approximately 11:11 a.m., the licensee failed to maintain two barriers such that it would require an individual passage through two barriers to gain access to vital equipment. Additionally, the licensee's maintenance personnel failed to follow their procedures to notify security prior to the removal of a vital barrier."

TVA RESPONSE

TVA agrees that this violation occurred.

REASON FOR VIOLATION

This violation occurred because the Maintenance planners failed to adequately scope the job to identify special circumstances or conditions related to the specific task due to limited awareness of this type of event. In addition, the author of the initial Preventive Maintenance (PM) instruction did not consider the possibility that a security breach could occur during the performance of the PM task, therefore, this type of relevant information was omitted.

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CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A Nuclear Security officer discovered the vital area breach during the Auxiliary Building walk around. The officer immediately posted the breach until the PM instruction was completed.

To improve awareness of this type of event, personnel in the Maintenance and Maintenance Planning organizations were informed of the circumstances which lead to the unauthorized security breach. A memorandum was issued to Maintenance management to review the security breach with their supervisors and employees in order to increase awareness of the potential for occurrence.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

The applicable PM instruction was revised to include the requirements in SSP-6.02, "Maintenance Management System," for security breaches.

As an enhancement, signs were placed on the applicable protective/vital barrier to notify Nuclear Security before opening.

Similar PM procedures on handling systems and miscellaneous heavy equipment in the Reactor and Auxiliary Buildings and building doors and hatches were reviewed to determine if this situation could exist in other procedures. One additional maintenance instruction will be revised to add a statement to identify breaching requirements and as an enhancement, six additional Auxiliary Building barriers will have signs installed.

DATE WHEN IN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the cited violation, TVA is in full compliance. The additional procedure revision and the signs discussed above will be complete by August 1, 1996.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNIT 1 AND 2
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LIST OF COMMITMENTS

1. Two openings have a temporary modification (a concrete block on top of the opening). A permanent modification will be in place by September 15, 1996.
2. BP-354 will be revised to notify Nuclear Security prior to performance of any work on the yard drainage system inside the protected area.
3. The additional procedure revision and the additional signs will be complete by August 1, 1996.