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AUG 23 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, 391/96-08 - REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of Violation (NOV) 50-390/96-08-02. The subject NOV identified three examples regarding maintenance procedure requirements. TVA's reply to this NOV is provided in the enclosure.

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

Sincerely,

  
J. A. Scalice

Enclosure  
cc: See page 2

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cc (Enclosure):

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ENCLOSURE  
WATTS BAR NUCLEAR PLANT UNIT 1  
REPLY TO NOTICE OF VIOLATION  
NOV 50-390/96-08-02

NOTICE OF VIOLATION 390/96-08-02

"Technical Specification 5.7.1.1 requires that written procedures 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 safe control of maintenance for nuclear power plants.

Site Standard Practice (SSP)-6.02, Maintenance Management System, Revision 16, Section 2.5.1.C.5, requires a worker to "document irregularities or differences pertaining to the equipment in the work performed section." SSP-6.02, Appendix G, Actual Work Performed Form, states a worker shall provide "a summary of as found condition" in the As Found Condition section and shall provide sufficient detail that would allow "the identification of problems/deficiencies found during work performance, the actions taken to correct" in the Actual Work Performed section of the form.

SSP-6.02, Maintenance Management System, Revision 16, Section 2.4.3, requires in part, that a foreman initiate an appropriate corrective action program document if a deficiency met criteria in Appendix EE, Deficiency Evaluation Guidance. Appendix EE requires initiation of a Problem Evaluation Report if a deficiency on safety-related equipment needs an extent of condition evaluation or constitutes an installation error or human error.

Contrary to the above, as of June 10, 1996, the licensee failed to follow maintenance procedures for completed Work Order 96-06961-00 on the safety-related 1B-B centrifugal charging pump in the following examples:"

EXAMPLE 1

"Workers and reviewing foreman did not document irregularities or differences regarding excessive difficulty in removing an oil strainer which was painted over on the 1B-B charging pump in the work performed section in that a summary of as-found condition was not included in the As Found Condition section. This section was left blank."

EXAMPLE 2

"Workers and reviewing foremen did not document irregularities or differences with a painted over oil strainer on the 1B-B charging pump in the Actual Work Performed section in that sufficient detail that would allow the identification of problems found during work performance and the actions taken to correct them were not included

in the Actual Work Performed sections. The Actual Work Performed section listed completed work steps and did not mention the painted over strainer problem or the reason for replanning of the work order to remove the entire strainer assembly."

### EXAMPLE 3

"Neither the workers nor the foremen initiated an appropriate corrective action program document to correct the painted strainer deficiency which constituted a deficiency on safety-related equipment that needed an extent of condition evaluation and constituted an installation error or human error. The painted strainer resulted in replanning of the work order and approximately five extra hours of out-of-service time in a Limiting Condition for Operation."

### TVA RESPONSE

TVA agrees that this violation occurred.

### REASON FOR THE VIOLATION

This violation occurred because of poor written communication between the maintenance crew and the work order closure foreman. When the crew performed the work, it was recognized that in order to remove the oil strainer plug and to prevent equipment damage, additional steps to remove the oil strainer and its associated piping assembly had to be added to the work order. This work order replanning was needed in order to take the oil strainer assembly back to the shop where a vise could be used in removing the oil strainer plug.

The oil strainer assembly was subsequently replaced with an assembly removed from Unit 2. An Appendix A, "Request for Removal," of Business Practice (BP)-380, "Requests for Installed Unit 2 Non-Transferred Components," was completed and included in the work order package. Since the crew had followed the requirements of Work Order 96-06961-00 and the BP-380 was included documenting the transfer of the Unit 2 part, the crew did not feel any other description of the work activity was needed.

The crew did not recognize that the same condition may have existed with other equipment and did not write a Problem Evaluation Report (PER). Had the crew documented the work problems and their resolution, the subsequent closure foreman may have recognized the need for additional review for this condition. This was further complicated by the fact that the work order was reviewed by a foreman on a different shift, who was not involved in the work activity. This foreman closed the work order without knowing the encountered problems and their resolution.

### CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

Work Order 96-06961-00 has been amended to provide additional details on the conditions identified for the charging pump 1B-B oil strainer. Problem Evaluation Report WBP960529 was written to address in part

the effect of the oil strainer condition upon other equipment. A review to identify similar conditions has determined the oil strainer plug condition to be limited to centrifugal charging pumps 1A-A and 1B-B. Preventative Maintenance Instructions 1-PMP-062-0108-A and 1-PMP-062-0104-B for these pumps have been revised to include steps for removal of the assembly so that the oil strainer plug can be removed in the shop.

The work order closure process has been deemed adequate since the cause was determined to be poor communication by the working crew as to the actual work performed.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

The circumstances of this violation have been discussed with Maintenance personnel to ensure that documentation is performed during the work process and that conditions which may affect other equipment are recognized and documented within the corrective action program.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

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