



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

**AUG 06 1994**

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

Gentlemen:

In the Matter of the Application of )  
Tennessee Valley Authority ) Docket Nos. 50-390  
50-391

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NO. 50-390, 391/93-27  
- SUPPLEMENTAL RESPONSE TO NOTICE OF VIOLATION (NOV) 390/93-27-01

The purpose of this submittal is to revise a corrective action for the subject violation regarding the implementation of vendor requirements.

TVA provided an initial response to the subject NOV by letter dated June 14, 1993, and a supplemental response dated July 15, 1993. The violation concerned authorizing work to be performed in accordance with a vendor technical bulletin prior to engineering approval (Example 1), and failure to perform an equivalency evaluation when ordering a replacement part (Example 2). Similar occurrences were identified and documented in Significant Corrective Action Report (SCAR) WBSCA930068 as previously reported.

In TVA's supplemental response dated July 15, 1993, TVA committed to perform a select sample of workplans and work orders which installed or modified NAMCO limit switches of the type addressed in the SCAR to verify that the vendor requirements were properly implemented. Upon initiation of the committed corrective action, TVA discovered the sampling was not practical due to an inability to segregate the workplans/work orders that installed NAMCO limit switches.

TVA performed an engineering evaluation for the purpose of determining the adequacy of the installed limit switches. Snug tight requirements had been used generally onsite when vendor torquing requirements are not specified. However, the vendor had specified torquing requirements for these covers. The engineering evaluation resulted in an use-as-is disposition for the "snug tight condition" of the NAMCO limit switches.

7408160322 940806  
PDR ADOCK 05000390  
G PDR

LEO  
1/0

U.S. Nuclear Regulatory Commission

Page 2

AUG 06 1994

To perform this evaluation, NAMCO Controls was contacted to discuss this issue. The only consequence of improper cover plate screw tightening would be the potential for moisture intrusion. Limit switch operability would be a problem if sufficient water entered the limit switch housing. However, these non-environmentally qualified (EQ) limit switches are not required to function in environments that would challenge the gasket seal. Therefore, the installation of the limit switch cover plate screws tightened to "snug tight" provides an adequate seal to prevent moisture intrusion during normal plant operating environmental conditions. Workplans/work orders which affect EQ limit switches are prepared under a different (more stringent) process and are required to have specific vendor requirements included. Accordingly, EQ limit switches were excluded from the evaluation. These actions are further documented in WBSA930068.

Additionally, "snug tight" tightening requirements are specified in General Construction Specification G-53. For the subject cover plate screws, "snug tight" would result in normal force supplied to the clamped members by use of a standard screw driver. Thus, it is unlikely overtightening would have occurred.

All other commitments contained in the original response to NOV 390/93-27-01 remain unchanged. TVA has implemented the commitments and will be submitting this item for closure.

There are no commitments contained in this submittal. If you should have any questions, contact P. L. Pace at (615)-365-1824.

Sincerely,



Dwight E. Nunn  
Vice President  
New Plant Completion  
Watts Bar Nuclear Plant

cc: See page 3