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FEB 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) - SUPPLEMENT AND CLARIFICATION OF THE LETTER WHICH SUBMITTED REVISION 4 TO CORRECTIVE ACTION PROGRAM (CAP) PLAN FOR VENDOR INFORMATION AND RESPONSE TO NRC QUESTIONS CONCERNING THE PROGRAM

The purpose of this letter is to provide clarification of the scope of the Vendor Information Corrective Action Program (CAP) and to provide a response to additional NRC questions in Inspection Report 390, 391/93-27 and subsequent September 9, 1993 letter.

Enclosure 1 provides a discussion of the scope of the program relative to the control of vendor technical manuals for (1) Reactor Protection System equipment, and (2) safety-related relays.

Enclosure 2 provides TVA's response to NRC's questions in NRC Inspection Report 390, 391/93-27 on the effectiveness of the Installation Design Requirements (IDR) review program and the field walkdowns, the availability of uncontrolled vendor drawings and vendor manuals in work areas, and the potential for misuse of these uncontrolled documents.

Enclosure 3 provides a response to NRC's request in a letter dated September 9, 1993, to discuss whether the corrective actions proposed for Violation 93-27-01 are affected by the findings documented in Inspection Report 390, 391/93-53.

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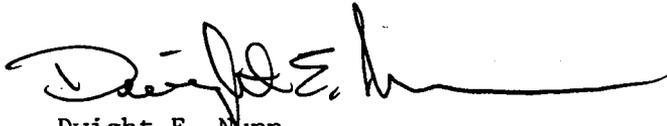
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Please direct any questions concerning this submittal to P. L. Pace at
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Sincerely,



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Enclosures

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Enclosure 1

Discussion of the Scope of the Program

The following discussion provides clarification of statements in the cover letter to Revision 4 to the Vendor Information Corrective Action Program (VI CAP) concerning the scope of the program relative to the control of vendor technical manuals for (1) Reactor Protection System equipment, and (2) safety-related relays.

1. Reactor Protection System (RPS)

Cover Letter Statement: "Reactor Protection System components are not completely itemized. The system is under major redesign, and vendor requirements will be addressed as part of the modification control process."

Discussion: This statement was provided to clarify that upgrading of old vendor manuals will not be done where design changes will result in the submittal of new manuals by the vendor.

The letter attempted to explain that RPS components were not completely itemized because the system was under design change and vendor requirements would be addressed as part of the modification control process. This was not intended to imply that no VTMs would be prepared for the RPS. In fact, VTMs have been issued for the solid state protection system (SSPS), the reactor trip switch gear, and the Eagle 21 process protection system.

Where components are not itemized and not described in a VTM, installation, testing, and maintenance are controlled by issued design output (including engineering approved vendor documents) or approved instructions based on equipment history.

2. Safety-Related Relays

Cover Letter Statement: "Some relays are not itemized, but installation is addressed in design output via approved drawings, and maintenance is addressed through instructions based on proven maintenance history."

Discussion: Vendor information for relays associated with specific equipment is often included in the controlled VTM for the equipment assembly. The SSPS VTM (discussed above) addresses both input and output relays. Also, vendor technical documents are provided for relays in the 480V and 6.9kV shutdown boards. The December 1, 1992 Q-List, which established the benchline Q-List components, however, does not distinctly itemize and classify all safety-related relays. Consequently, the VI CAP does not specifically address all safety-related relays. Accuracy calculations and Scaling and Setpoint Documents have been prepared for relays where timing function is critical and a limit has been established. Unique component identifiers have been assigned to these relays. Evolving refinements

to the data contained in the Q-List will also trigger the review and upgrade processes controlled by SSP-2.10.

Enclosure 2

Response to NRC's Questions

Installation Design Requirements Review

NRC Concern: NRC has indicated that the Installation Design Requirements (IDR) Review program, implemented to provide assurance that vendor supplied equipment was installed in accordance with vendor requirements, was not fully effective. It did not include diesel generators or equipment supplied by Westinghouse.

Discussion: Nuclear Steam Supply (NSSS) and Emergency Diesel Generator (EDG) installations were accomplished under vendor supervision. At the time, it was considered reasonable to assume that the vendors had ensured installation per their own program requirements. The scope of the IDR review, however, was expanded to include NSSS and EDG. This is discussed in the Installation Design Requirements (IDR) Phase IV Report, Revision 2, Section 2.0, which was issued December 13, 1993.

Field Verification

NRC Concern: NRC also expressed concern that some of the field verification lacked adequate depth and scope. (This issue is also tracked by Inspection Followup Item (IFI) 93-27-04.)

Discussion: In conjunction with early IDR development, a short term effort was mounted to perform field verifications in support of the Pre-start Test Program. Not part of the IDR directly, the objective of this undertaking was to provide reasonable assurance that testing could proceed with minimal risk of rework due to the inadequate incorporation of vendor requirements at the time of component installation. The Prestart Test Program was later replaced with a Regulatory Guide 1.68 testing program. Sixty seven components were selected on the bases of the impending system test schedule, the components' safety significance, and the ability of an attribute to be observed without recourse to a work implementing document. The data gathered during these verifications provided valuable additional information that was used later by the IDR in support of specific equipment type closures, but was not used as the sole means of addressing any of the IDR vendor requirement categories. In other words, although some of the information gathered was beneficial to the IDR, this particular process was carried out in parallel and was never intended to be as thorough as the IDR itself. As stated above, the IDR Phase IV Report was completed December 13, 1993, and it is intended as the documentation of the acceptability of plant installations.

Availability of Uncontrolled Vendor Drawings and Vendor Technical Manuals In Work Areas

NRC Concern: NRC was concerned over the availability of uncontrolled vendor drawings and vendor technical manuals in work areas and the potential for misuse of these uncontrolled documents by TVA employees and contractors.

Response: Site Standard Practice (SSP)-2.07, "Document Control," establishes controls to ensure that the latest applicable controlled documents and drawings are available for work. Vendor manual drawings are defined in SSP-2.10 as "Information Only," and cannot be used to perform work. However, if a TVA-generated drawing is not available, and a vendor drawing has to be used to perform work, the drawing must be evaluated by Nuclear Engineering and stamped by Document Control and Records Management (DCRM) as a temporary control drawing.

The requirements for the use of vendor manuals are identified in SSP-2.10, "Vendor Manual/Information Control." SSP-2.10 limits the use of vendor manuals on TVA activities affecting safety-related equipment to manuals that are obtained from DCRM. This procedure prohibits the use of manuals in lieu of procedures, work instructions, design input or design output. Manuals may be used as references for instruction development, trouble shooting, or as a portion of an instruction after appropriated work boundary conditions are established.

The following improvements have been made to avoid the potential for misuse of vendor information obtained from uncontrolled sources:

- In the past, vendor manuals contained a note indicating that vendor drawings in the manuals are for "Information Only." To avoid a possible oversight of this note, drawings in safety-related component vendor manuals have been stamped with red ink "Information Only." Site Support Administration Instruction (SAI)-18.02, "Processing and Controlling Vendor Manuals," has been revised to require DCRM to stamp all drawings in safety-related VTMs with a red "Information Only" stamp.
- Because of the inconvenience of using the Interim Office Building controlled VTMs (which are across site from Procurement Engineering Group), controlled VTMs have been established in the PEG area.

ENCLOSURE 3

TVA'S RESPONSE AS REQUESTED IN NRC'S LETTER OF SEPTEMBER 9, 1993

In NRC's letter of September 9, 1993, NRC stated that, subsequent to TVA's supplemental response of July 15, 1993, to Violation 93-27-01, several examples of failure to follow procedures concerning the use of vendor drawings were identified during an NRC inspection in July 1993, and were documented in NRC Inspection Report 50-390, 391/93-53. NRC requested TVA to provide an additional response to discuss whether the corrective actions for Violation 93-27-01 are affected by these additional findings. The purpose of this enclosure is to provide this additional response.

TVA has recognized that other new occurrences of the incorrect application of vendor information, since the 93-27-01 violation, warrant stronger actions. In addition to a procedural change for the specific area of weakness identified by Violation 93-53-04 and awareness training for involved personnel (See TVA's November 16, 1993 response to the violation.), TVA has implemented programmatic actions through extensive broad based training and controls. The identification of several new vendor information usage issues was discussed in the NRC/TVA meeting on October 19, 1994. As a result, TVA has expanded the training on vendor information as discussed in that meeting. In December, 1994, training was completed as corrective action for Problem Evaluation Report WBP940298. More than 900 persons who use vendor information were trained in vendor document requirements. This training was performed by the Vendor Information Program Manager and included discussion on the control and use of vendor documents.

In addition to the training effort above, part of the process of overview and assessment of the VI CAP includes WBN Nuclear Assurance and the line organizations providing confirmation of the proper application of vendor information in the work process.