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FEB 24 1993

U.S. Nuclear Regulatory Commission
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Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT 50-390, 391/92-46 -
REPLY TO NOTICE OF VIOLATION

This letter responds to a notice of violation identified February 4, 1993. The notice of violation involves the failure of TVA (WBN) to assure prompt identification and correction of conditions adverse to quality. The enclosure to this letter addresses the notice of violation and the corrective actions taken by TVA.

Should there be any questions regarding this information, please telephone P. L. Pace at (615) 365-1824.

Very truly yours,

William J. Museler

Enclosure
cc: See page 2

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cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1 AND UNIT 2
NOTICE OF VIOLATION (NOV) 50-390, 391/92-46-01

NOV 50-390, 391/92-46-01

10 CFR 50, Appendix B, Criterion XVI, and the accepted TVA Nuclear Quality Assurance Plan, Section 10.2.2, require measures which assure prompt identification and correction of conditions adverse to quality.

Contrary to the above, the measures taken by the licensee did not assure prompt identification and correction of conditions adverse to quality (CAQs). The identification of missing records in Nonconforming Condition Reports (NCRs) 6722 for Unit 1 and 6723 for Unit 2 remained in error for over six years. Additionally, the licensee stated that the error was specifically recognized in 1991 but it remained uncorrected over a year later.

Unit 1 NCR 6722 identified a list of missing records for resolution. The list was annotated indicating many of the listed records would be transferred to Unit 2 NCR 6723 for resolution. The transfer process resulted in two discrepancies:

- (1) Some of the items annotated to indicate transfer to and found identified in Unit 2 NCR 6723 were Unit 1 and Common Unit records applicable to components required for safe operation of Unit 1. Examples of Unit 1 component test records improperly assigned and transferred to NCR 6723 were tests 25B (instrument panel inspection) and test 62A (inspection of bolted electrical connections) for Reactor Protection Panels 1-PNL-99-R12-G and 1-PNL-99-R13-G.
- (2) Some of the items annotated for transfer were not included in NCR 6723 and therefore might not be fully addressed through any corrective action process. Examples included missing documentation for test 57A, Preparation and Inspection of Cable Splices, on Unit 2 Essential Raw Cooling Water System cables 2-5PP-67-675-A and 2-3PP-67-689-A.

The deficient annotations and transfers of records for resolution resulted in the discrepant conditions remaining incorrectly or incompletely identified from initiation of NCRs 6722 and 6723 in 1986 until NRC identification of the discrepancy in 1992. The licensee indicated that the incorrect transfer of missing records to the Unit 2 NCR was recognized in an evaluation conducted in 1991 as corrective action to a previous NRC violation. However, the erroneous transfers were neither corrected at that time nor identified for future correction.

This is a Severity Level IV violation (Supplement II).

TVA Reply To NOV 50-390, 391/92-46-01

Reason For The Violation:

The reason for the original invalid annotations in the list of missing records contained in NCR 6722 and the incorrect/incomplete list of missing records in NCR 6723 is attributed to improper work practice by an individual in the 1986 timeframe. While TVA agrees that these deficiencies remained uncorrected and were not specifically marked for future correction, TVA considers that the missing record issues documented in WBP870036SCA (Unit 1) and NCR 6723 (Unit 2) should have been addressed upon closure.

The decision not to correct NCRs 6722 and 6723 in 1991 was based on two factors. First, the annotations contained in the list of missing records documented in NCR 6722 were not signed or dated. These annotations were intentionally disregarded since they were not considered to be a valid way to change a quality assurance record. Second, WBN procedures allow for newly identified conditions to be evaluated and dispositioned during corrective action implementation, so long as the condition adverse to quality is revised prior to closure. TVA recognizes, however, that established procedures do not specifically require closure verification of the adequacy of a previously revised description of condition in a condition adverse to quality document. Given the complexity of the subject corrective action document, more proactive steps could have been taken in 1991 to revise NCRs 6722 and 6723 or document the identified inconsistencies to ensure future correction.

Corrective Steps That Have Been Taken And Results Achieved:

TVA has taken several actions to address the notice of violation.

- (1) As noted in NRC Inspection Report 50-390, 391/92-46, WBP870036SCA has been revised (Revision 6) to cancel annotations that indicated transfer of missing record items to Unit 2 NCR 6723 (now SCRWBN6723SCA).
- (2) In order to assure timely resolution of WBP870036SCA, a dedicated team has been assigned to the closure of this condition adverse to quality.
- (3) Required predecessor activities have been completed and emphasis has been placed on WBP870036SCA missing record issues. Part of this emphasis has been concentrated on the specific list containing the examples cited in the notice of violation. The items listed on the eight pages which had been annotated with the reference to NCR 6723 have been reviewed. Each missing record was either located, reconstructed, or found to be covered by later documentation. The remaining items listed in WBP870036SCA will be addressed through the closure process in the manner indicated in Revision 6. The current completion date for WBP870036SCA is March 31, 1993.

Corrective Steps That Will Be Taken To Avoid Further Violations:

The need to address inconsistencies in conditions adverse to quality documents upon discovery has been reemphasized to the responsible TVA manager. No further actions are deemed necessary. The examples cited in the notice of violation are considered an isolated case. As stated in NRC Inspection Report 50-390, 391/92-46:

- (1) "The TVA manager was unable to identify any similar situation where an annotated or otherwise marked-up CAQ description of condition had been addressed."
- (2) "The inspectors obtained and reviewed a sample (16) of closed SCARS [significant corrective action reports] for evidence of any such precedent:... The above SCARS were selected for review because the complexity of the issues they addressed and/or their multiple revisions suggested potential similarity to WBP870036SCA. Detailed review failed to reveal any lineouts, deletions, or transfers of issues similar to those in WBP870036SCA."

The Date When Full Compliance Will Be Achieved:

Full compliance was achieved in November 1992 when WBP870036SCA Revision 6 was issued. The closure date for WBP870036SCA is currently scheduled for March 31, 1993.