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

OCT 1 0 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) - UNIT 1 - NRC INSPECTION REPORT NO 50-390, 391/95-51 - REPLY TO NOTICE OF VIOLATION 390/95-51-01

The purpose of this response is to provide additional information regarding Notice of Violation 390/95-51-01 discussed in the subject report dated September 21, 1995.

TVA provided a response September 15, 1995, to the potential violation identified in the NRC exit interview for the subject inspection. This letter supplements TVA's response by addressing NRC questions about training and procedural controls for vendor technical manual reviews for incorporation into plant procedures.

Enclosure 1 of this letter provides the requested information.

Commitments are listed in Enclosure 2.

If you should have any questions on this information, please contact P. L. Pace at (615) 365-1824.

Sincerely,

R. R. Baron
Nuclear Assurance
and Licensing Manager (Acting)

Enclosures
cc: See page 2

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cc (Enclosures):
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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1
NRC INSPECTION REPORT NO. 50-390, 391/95-51
REPLY TO NOTICE OF VIOLATION

NRC Question

"We have reviewed your letter dated September 15, 1995, in which you discuss your evaluation of the violation in the enclosed Notice. Since you identified other instances where the vendor technical manual review had not been performed, we believe that your training and procedural controls need to be addressed. We request that you provide your evaluation of these aspects in your response to this violation."

TVA Response

TVA's response to the specific violation concerning the lubrication requirements for the Containment Personnel Airlocks was provided on September 15, 1995. As indicated in the response, the deficiency involved a special one-time review, and documentation in question was replaced. The "other instances" of problems with vendor technical manual reviews were confined to this same one-time review of preventative maintenance procedures (PMs). Because the entire population of items has been reviewed and corrected, no further actions in this area are considered warranted.

In addressing how vendor recommendations are currently considered by the maintenance organization and other site organizations, the Document Control Records Management (DCRM) organization maintains a cross-reference between vendor manuals and site procedures. When vendor manuals are revised, DCRM notifies affected organizations via Site Standard Practice (SSP)-2.04, "Source Requirements Identification and Tracking," Appendix C, with a due date for completion.

The affected organizations perform the review of the changes and determine if any action is needed. Their documented review is made on the Appendix C form and returned to DCRM. If the review form is not returned by the sponsor by the required date, performance-based procedures will be subject to the administrative hold process. Therefore, the management and oversight of the review process is controlled outside the organization responsible for the procedural updating. This provides additional assurance that the reviews are performed.

Training in the above process is controlled by TVA's indoctrination process and the continuing process for review of procedure changes.

NRC Comment

"...corrective actions should include measures to assure that engineers and work planners effectively use the available vendor information."

TVA Response

In the area of maintenance planning and procurement engineering, TVA's Nuclear Assurance had previously identified weaknesses from the trending of vendor related issues, and corrective action documents

were initiated. Also, Nuclear Assurance assessments and the results of a Design Change Notice (DCN) sampling plan from Problem Evaluation Report (PER) WBPER940355 indicated that improvements in the area of Engineering awareness of expectations in the use of vendor information were warranted. TVA's initiatives in these areas are outlined below:

Work (Maintenance) Planning

Maintenance improvement initiatives are in place to ensure that vendor technical information is incorporated into planned work packages. A revision to the Planner's Guide was initiated to provide management expectations, guidelines, and supporting references to planners. These instructions are for additional guidance and do not supersede or replace plant procedures.

Enhancements to planner training were initiated. A job task analysis and personnel skills assessment have been completed. Specialized planner training has been initiated and is continuing.

As an interim action, component engineers now perform a technical review of safety-related work orders. This review includes ensuring appropriate vendor technical requirements are utilized, appropriate level of reviews for work instructions are obtained, and appropriate acceptance criteria are incorporated.

The Maintenance Department is utilizing the results of ongoing Nuclear Assurance (NA) oversight efforts, together with continuing maintenance management assessments, to effect maintenance improvements and measure the effectiveness of improvement plans. The NA efforts include: ongoing Quality Engineering (QE) sampling of work orders (WOs); vertical slice reviews of selected WO completion packages; QA in-process work sampling; and special assessments of WO planning and implementation adequacy. Maintenance management has initiated periodic communication meetings with NA to discuss, evaluate, and resolve matters of mutual interest.

Procurement Engineering

In this area, the Procurement Engineering Group (PEG) determined that the weakness stems from a lack of technical training encompassing both management and employees. The cause analysis identified inadequate knowledge of design basis and engineering requirements on the part of PEG.

The cause analysis also pointed out a weakness in SSP-10.05, "Technical Evaluation for Procurement of Materials and Services," concerning the source for defining storage requirements. SSP-10.05 will be updated by October 20, 1995, to reflect ANSI N45.2.2 as the source for defining storage requirements.

In order to strengthen the overall knowledge base of the PEG, PEG engineers and management have been enrolled in the Watts Bar Engineering Support Personnel (ESP) Curriculum and Systems Training (EGT) 302.001.

The three specific hardware issues identified in regards to storage requirements (WBN-1-ISV-070-0501 and WBN-1-ISV-070-0736 identified by Nuclear Assurance and the Woodward Governor site glasses identified by NRC) were evaluated and dispositioned via PEG packages and were found to be adequately stored under current conditions.

Nuclear Assurance provides oversight in the PEG by performing in-line sampling review of procurement documents. During this review, Nuclear Assurance is placing special emphasis on appropriate utilization of vendor information. The results of a special assessment currently being performed to evaluate the actions taken to improve their performance will provide further management feedback to determine their effectiveness.

Nuclear Engineering

TVA has taken actions to ensure that engineers effectively use the available vendor information:

TVA conducted extensive vendor training for site personnel in December 1994. Site Engineering was included in the target population required to attend the training, which was given in one-hour blocks. A portion of the training was directed at Engineering and WBPER940355 was discussed in each class. A handout which summarized key points was distributed to each person who attended. The handout, however, did not contain all of the information that was discussed. Its purpose was to serve as a reminder of those key elements that were covered during actual instruction or class discussion.

A refresher class for engineering personnel was conducted on August 2, 1995. The content, focus, and duration of the class were the result of meetings between the Engineering Manager, the Engineering Support Manager, and the Vendor Program Manager. Nuclear Assurance assessments and the results of a Design Change Notice (DCN) sampling plan from WBPER940355 indicated that, although hardware installations were not impacted, Engineering was still prone to administrative errors when preparing DCNs. The training sessions, therefore, were devised to address the identified scope in a direct and efficient manner without diluting the effectiveness of the presentation by discussing a large number of other program elements.

The Engineering Support Manager attended each session and presented management's expectations of the level of compliance required by Engineering personnel. These expectations were clearly conveyed in every class, and the handout given to each participant was intended to serve as a reminder of management expectations, not a detailed retraining of the general subject areas covered in the class.

Operational Readiness

Since the September 15 response, an additional assessment has been completed which included a review of vendor manual recommendations versus plant instructions (including maintenance procedures). In that report, Nuclear Assurance concluded that, overall, although some stored equipment contained differences from vendor information, no safety-significant problems were found, and TVA has a 95 percent confidence that at least 95 percent of the components and equipment have been installed per the vendor manual, or any deviations that would exist would be of no safety-significance.

TVA considers the improvements discussed above to support operational readiness and provide additional assurance that management expectations are being met. The focus on training and management oversight of processes already in place as a result of the Vendor Information Program provide further assurance that vendor information is being considered by the affected site organizations.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNIT 1
NRC INSPECTION REPORT NO. 50-390, 391/95-51
REPLY TO NOTICE OF VIOLATION

List of Commitments

1. SSP-10.05 will be updated by October 20, 1995, to reflect ANSI N45.2.2 as the source for defining storage requirements.