

U.S. Nuclear Regulatory Commission
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cc (Enclosures):

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ENCLOSURE 1
WATTS BAR NUCLEAR PLANT UNIT 1
REPLY TO NRC'S OCTOBER 18, 1993 LETTER TO TVA
NRC VIOLATIONS 390/93-63-02

DESCRIPTION OF VIOLATION 390/93-63-02

During an NRC inspection conducted August 21, 1993 through September 18, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

10 CFR 50, Appendix B Criterion XVI, Corrective Action, requires in part that measures be established to assure that conditions adverse to quality, such as deficiencies and nonconformances are promptly identified and corrected.

Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 3, Section 10.1, requires that adverse conditions shall be identified, evaluated, and corrected. Section 10.2.2.C also requires that adverse conditions shall be dispositioned and shall be corrected in accordance with documented plans.

Site Standard Practice SSP-3.06, Problem Evaluation Reports, Revision 11, Section 2.4.F, requires that specific actions to correct adverse conditions and prevent recurrence be developed. Section 2.5.A requires that the implementing organization implement or monitor the implementation of the approved corrective actions.

The corrective actions from Problem Evaluation Report (PER) WBP871301PER require the replacement of all existing ServicAir type flexible conduit used in safety-related applications.

Contrary to the above, as of September 1, 1993, conditions adverse to quality were not promptly identified and corrected in that the established corrective actions for PER WBP871301PER were inadequate as evidenced by the failure to replace the Class 1E ServicAir flexible conduit installed at instrument 1-LT-63-183. This condition was identified after modifications for the affected system were determined to be complete.

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

TVA RESPONSE 390/93-63-02

REASON FOR THE VIOLATION

This violation occurred as a result of TVA's failure to provide an adequate source of information for the identification of ServicAir flexible conduits which required replacement. Based upon a conduit listing from the computerized cable routing system (CCRS) database, a conduit inspection walkdown was being performed

to identify which conduits required ServicAir replacement. Since the ServicAir flexible conduit from junction box 3321 to instrument 1-LT-63-183 was not required to be uniquely identified in CCRS, this resulted in this conduit not being identified for replacement during the walkdown.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

When this issue and others related to incomplete modification activities arose, TVA chose to postpone preoperational testing on components and systems to investigate the causes. As discussed above, TVA discovered that flexible conduits without conduit numbers in CCRS were not identified for field inspection. As an interim measure, TVA performed walkdowns on previously turned over systems in accordance with SSP-9.A, "Administration of Walkdown Documents," to identify any flexible conduits without conduit numbers and ServicAir flexible conduit in the vicinity of class 1E end devices. Work orders were written immediately to replace the ServicAir conduits identified, and to place the unidentified conduits into the existing flexible conduit corrective action program.

The Startup and Test organization was notified via a component exception list which end devices within these systems were found with ServicAir or damaged conduit. This list provided a means to evaluate the possible impact on testing.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

Prior to this issue, as part of the corrective action for Problem Evaluation Report WBP871301PER, General Construction Specification G-40 had been revised to state that all class 1E ServicAir flexible conduit installations would be replaced. Nuclear Engineering determined later that this statement was overly conservative for flexible conduit installation supplied as part of a vendor qualified package unit, except in those cases where considerable work associated with the local instrument panels was performed (e.g., the addition of instruments, changeout of components, disassembly/reassembly for initial installation and painting). In these instances, it is highly probable that the current configuration is not the same as that originally supplied by the vendor. As a result, TVA has revised Section 2.3.8.3 of G-40 to clarify the requirement for replacement of ServicAir stainless steel flexible conduits supplied on vendor qualified units.

In order to provide an adequate source of information for the future inspections, TVA has issued Design Change Notice (DCN) Q-26979-A which defines the scope of scheduled class 1E conduits to be inspected as part of WBP871301PER corrective action and the revised G-40. Also, TVA will issue design output to define the class 1E components which must be inspected under the G-40 revision for the presence of unscheduled conduits.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA will be full compliance upon issuance of the above design requirements scheduled to occur before December 1, 1993.

ADDITIONAL INFORMATION

Unresolved Item (URI) 50-390/93-63-01 identifies the concern whether ServicAir flexible conduit was installed in areas outside containment other than the annulus or main steam valve rooms. Subsequent to the identification of this issue, TVA identified ServicAir conduits in the Auxiliary Building. The corrective actions described above have addressed this condition. Therefore, TVA has determined that no further actions are required for this URI.

ENCLOSURE 2

LIST OF COMMITMENTS

1. TVA will issue design output to define the class 1E components which must be inspected under the G-40 revision for the presence of unscheduled conduits. This design output is scheduled to be issued by December 1, 1993.