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DEC 23 1993

U.S. Nuclear Regulatory Commission
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Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 AND 2 - NRC INSPECTION REPORT NO. 390, 391/93-70 SUPPLEMENTAL RESPONSE TO NOTICES OF VIOLATION

The purpose of this letter is to supplement TVA's response, dated December 14, 1993, to Notices of Violation 390/93-70-01 and 390/93-70-02. Enclosure 1 to this letter revises TVA's response to Notice of Violation 390/93-70-02 addressing the staff's concern that Quality Control inspectors failed to identify unacceptable conditions. Enclosure 2 provides additional information addressing the evaluation of an inspector's past performance and a correction to the number of inspector overviews associated with Notice of Violation 390/93-70-01. No new commitments are contained in this submittal.

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

Very truly yours,

William J. Museler

Enclosures
cc: See page 2

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cc (Enclosures):

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1
SUPPLEMENTAL RESPONSE TO TVA'S REPLY
TO NOTICE OF VIOLATION 390/93-70-02

Enclosure 2 to Notice of Violation 390/93-70-02 provided TVA's response to the four examples of activities affecting quality that were not accomplished in accordance with approved procedures. Upon a further review of the actions associated with Problem Evaluation Report (PER) WBP930338, TVA provides the following supplemental information in connection with the response to Example 4.

REASON FOR THE VIOLATION

Example 4

As described in the initial response, quality control inspections were not performed in accordance with the criteria set forth in the applicable procedure. However, in the course of reviewing the actions associated with the above referenced PER, our review indicated that in the cases cited in the violation the approved work instructions provided the installation requirements, which the Quality Control inspectors followed in performing their inspections. TVA notes that this is consistent with TVA's implementation of Site Standard Practice (SSP)-3.01, "Quality Assurance Program," Revision 4, paragraph 2.5E, which provides that inspections shall be performed in accordance with approved work instructions or referenced procedures. Quality Control inspectors had been instructed to conduct their inspections in accordance with the information contained in the work instruction. However, in these cases the torque values provided in the work instructions did not accurately reflect the values required by the procedure.

It is the responsibility of the work instruction preparer to provide correct requirements in the work instruction. The Site Quality organization verifies, by a sample review of completed work instructions that have been released from the field, that the correct requirements have been specified. The specific work instructions in question had not been included in this review process by the Site Quality organization since they had not yet been released from the field.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Example 4

As previously indicated in our initial response, in order to provide an additional level of assurance that work instructions accurately reflect procedural requirements, Quality Control inspectors have received further instruction regarding their attentiveness to this issue and the application of their knowledge of procedural requirements when implementing work instructions.

In addition to the review being completed as a corrective step for Example 1, Quality Engineering personnel have reviewed their previous sample results to ascertain whether there had been a previously undetected indication of errors in work instructions. This review disclosed no additional errors among the previously reviewed instructions in translating procedural requirements to the work instructions.

Further, a training session has been conducted with the Quality Engineering work instruction reviewers to ensure that they are aware of the problems identified by the subject violation. The training also emphasized the importance of reviewing the information specified in the work instruction for compliance with procedural requirements. In addition, the QC inspectors have been instructed to utilize the referenced procedures when there is a question or concern with the information provided on the data sheets. Conflicts between the work instruction and the procedure are to be resolved before work is resumed.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The corrective actions for PER WBP930338 have been rescheduled for completion to coincide with the system turnover to provide adequate time to resolve any deficiencies that may be identified from the workplan review.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNIT 1
SUPPLEMENTAL RESPONSE TO TVA'S REPLY
TO NOTICE OF VIOLATION 390/93-70-01

390/93-70-01

Example 1

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

TVA's response should be revised to indicate 13 (originally identified as 10) similar work plans involving over 100 supports were reviewed to provide adequate assurance that this condition was isolated.

RESPONSE TO NRC CONCERNS

Enclosure 3 to Notice of Violations 390/93-70-01 and 390/93-70-02 addressed NRC concerns about the effectiveness of Quality Control inspections. TVA's response to the situation identified in Example 1 of 390/93-70-01 addressed, in part, the specific actions taken to address an inspector's past performance. The third paragraph of Enclosure 3 should be revised to indicate that in 1993 the Quality Control contractor had performed 14 (originally identified as nine) monitoring activities of the inspector's work with no discrepancies identified. In addition, TVA has now completed 209 reinspection overviews of the inspector's work with only four discrepancies being identified (originally identified as 3 minor documentation discrepancies). Three of these discrepancies were identical and identified during one overview inspection of a typical installation of an instrument rack. The remaining discrepancy identified a missing locking device.

As previously indicated in our initial response, a sample of 10 items recently inspected by the subject inspector were reinspected to provide additional confidence that no additional performance concerns existed. No deviations were identified by this reinspection. This satisfies the commitment for the subject violation listed in Enclosure 4 of the original response.