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JAN 19 1994

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, 391/93-58 -
NOTICE OF VIOLATION 50-390, 391/93-58B - REQUEST FOR ADDITIONAL INFORMATION

The purpose of this letter is to provide the additional information requested by NRC letter dated December 17, 1993. On November 16, 1993, NRC acknowledged TVA's November 3, 1993, response to Inspection Report 50-390, 391/93-58 issued on October 4, 1993. Subsequent to the NRC November 16 letter, a further review of TVA's November 3 response identified several issues involving Violation B, Example 1, that need to be clarified.

The enclosure to this letter provides TVA's response to the NRC issues. No new commitments are being made in this submittal.

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

Very truly yours,

William J. Museler

Enclosure
cc: See page 2

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ENCLOSURE

NRC INSPECTION REPORT 50-390, 391/93-58
NOTICE OF VIOLATION 50-390, 391/93-58B
RESPONSE TO NRC ISSUES

NRC CONCERN

On November 16, 1993, NRC acknowledged TVA's response of November 3, 1993, to NRC Inspection Report 50-390, 391/93-58 issued on October 4, 1993. Subsequent to the NRC November 16 letter, a further review of TVA's November 3 response identified several issues involving Violation B, Example 1, that need to be clarified.

In reference to the Administrative Control Program (ACP) element of TVA's corrective action program that addresses drawing deviations, TVA's response stated that "valid drawing deviations" were defined as conditions where the plant configuration is correct and drawings are in error. SSP-2.11, Drawing Deviation Program, defines a "drawing deviation" as an apparent difference between approved drawings and the plant configuration. Also, paragraph 2.5 and Appendix E, of SSP-2.11 further indicate a broader "definition" of valid drawing deviations by specifying, as one of the categories of drawing deviations to be trended, the situation where the drawing is correct and the plant configuration is incorrect. Please clarify this apparent discrepancy, as it relates to TVA's corrective action for SSP-2.11.

In regard to the ACP element of TVA's corrective action program that involves work requests and work orders, TVA's response stated that potentially reportable conditions were outside the scope of work that could be performed by the work request/work order process. However, the work typically performed on safety-related work requests and work orders appears to meet the criteria for "potential reportability" contained on the screening forms in SSP-4.05, NRC Reporting Requirements, and in other ACP procedures. Please clarify the response with respect to work requests and work orders as it relates to the corrective action for SSP-6.02.

TVA (WBN) RESPONSE

SSP-2.11, Drawing Deviation Program

As indicated in the NRC concern above, drawing deviations are generated when an apparent difference between approved drawings and the plant configuration is identified. Through a validation process, a drawing deviation is either processed under SSP-2.11 or closed and processed under another ACP such as a Problem Evaluation Report (PER) or a Significant Corrective Action Report (SCAR). The validation is performed by the operating plant staff (Technical Support).

Accordingly, after validation, a valid drawing deviation indicates that the plant physical condition is correct and that only the drawing is in error or that a minor labeling type deficiency exists. With the basic physical plant correct, a substantial safety hazard cannot be created and there would be no need for a specific documented reportability evaluation for a valid drawing deviation.

The trend codes on SSP-2.11 were established to provide the widest possible means of monitoring the effectiveness of the drawing deviation program. TVA recognizes this may have caused some confusion. The code "DR" was used to indicate that the drawing is correct or no drawing change is required. This category is addressed in either of two ways. Minor deviations with no impact on the plant (e.g., a minor tagging or labeling error where the tag or label needs to be corrected) can be resolved without upgrading the drawing deviation to some other ACP as discussed above. Remaining deviations in this trend category must be resolved in accordance with some other ACP, such as a PER or a SCAR.

Subsequent to the TVA violation response, SSP-2.11, Appendix D, was revised (effective date of January 10, 1994) to clarify the use of drawing deviations to address identified differences between drawings and the actual plant configuration. Appendix D emphasizes that drawing deviations are used to address situations where the drawing is in error and needs to be corrected and the plant configuration is correct.

SSP-6.02, Maintenance Management System

Routine corrective and preventive maintenance activities on correctly designed and installed components would not fall under the reporting criteria of 10 CFR 50.55(e). In those cases; however, where a design or construction problem is identified through the work request/work order process, a review for reportability would be required. TVA has chosen to accomplish this review by documenting the problem on other corrective action documents, such as a PER or a SCAR. Both documents are screened/evaluated for reportability under the requirements of 10 CFR 50.55(e).

On December 3, 1993, SSP-6.02 was revised to meet the commitments made to NRC in response to Notice of Violation 50-390, 391/93-58B, Example 1. In this revision, Appendix EE was incorporated to provide guidance for determining whether work requests/work orders should be upgraded to a PER or SCAR. The guidance provided is considered to be consistent with respect to those deficiencies which would be potentially reportable.