



Tennessee Valley Authority Post Office Box 2009 Spring Ct, Tennessee 37381

William J. Museler  
Site Vice President  
Watts Bar Nuclear Plant

JAN 20 1994

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 )

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - NRC INSPECTION REPORT NO. 390/93-63 -  
REPLY TO NOTICE OF VIOLATION 390/93-63-04

The purpose of this letter is to provide a reply to Notice of Violations 390/93-63-04 cited in the subject inspection report dated October 18, 1993. This violation identified a failure to maintain configuration control for Unit 1/Unit 2 interface points.

Enclosure 1 addresses the conditions described in the inspection report and the corrective actions taken by TVA. As discussed with the Region II Staff on November 17, 1993, TVA's response to Notice of Violation 390/93-63-04 was held in order to address a similar issue, previously identified as Unresolved Item (URI) 390/93-63-05. NRC closed this URI in Inspection Report 50-390/93-74 and identified the URI as an additional example of the subject violation.

Enclosure 2 provides the list of commitments made in this submittal. Should there be any questions regarding this information, please telephone P. L. Pace at (615) 365-1824.

Very truly yours,

William J. Museler

Enclosures  
cc: See page 2

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U.S. Nuclear Regulatory Commission  
Page 2

JAN 20 1994

cc (Enclosures):

NRC Resident Inspector  
Watts Bar Nuclear Plant  
Rt. 2, Box 700  
Spring City, Tennessee 37381

Mr. P. S. Tam, Senior Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852

U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

ENCLOSURE 1  
WATTS BAR NUCLEAR PLANT UNIT 1  
REPLY TO NRC'S OCTOBER 18, 1993 LETTER TO TVA  
NRC VIOLATION 390/93-63-04

DESCRIPTION OF VIOLATION 390/93-63-04

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, or drawings.

Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 3, Section 6.1.1, requires that quality-related activities be prescribed by documented procedures and instructions and shall be accomplished in accordance with these procedures and instructions.

Site Standard Practice SSP-9.04, Configuration Management/Control, Revision 1, paragraph 2.2, Plant Configuration Documentation, states that plant configuration includes the physical arrangements and functional attributes of structures, systems, and components. Paragraph 2.3, Configuration Control, states that changes to structures, systems, and components under configuration management are prohibited except as provided for in procedures SSP-9.02, SSP-9.03, SSP-12.04, or Startup Manual Procedure SMP-11.

Contrary to the above, on September 10, 1993, activities affecting quality had not been accomplished in accordance with approved procedures or drawings in that 16 fuses previously removed for Unit 1/Unit 2 interface control, as shown on configuration control drawings 1-45W749-1A, 480 V Shutdown Board 2A1-A Single Line, Revision 8; 1-45W749-2A, 480 V Shutdown Board 2A2-A Single Line, Revision 7; and 1-45W760-30-9, Ventilating System Schematic Diagrams Sh-9, Revision 9, were found installed in 480V Shutdown Boards 2A1-A and 2A2-A without documentation required by procedures SSP-9.02, SSP-9.03, SSP-12.04, or SMP-11.

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

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality be prescribed by documented instructions or procedures of a type appropriate to the circumstances and be accomplished in accordance with the instructions or procedures. This Criterion was used to cite VIO 50-390/93-63-04, Failure to Maintain Configuration Control for U1/U2 interface Points, and was for system 212 interface points (fuses) which were not maintained in accordance with approved procedures. Because these interface points as discussed in URI 390/93-63-05 were not included within the system 212 turnover boundaries, this contributed to the fuse configuration control. The failure to provide documented instructions or procedures for the transfer of system 212 interface points as indicated in the URI is therefore, also indentified as a violation of 10 CFR 50 Appendix B, Criterion V, and the second example of VIO 50-390/93-63-04.

ENCLOSURE 1  
WATTS BAR NUCLEAR PLANT UNIT 1  
REPLY TO NRC'S OCTOBER 18, 1993 LETTER TO TVA  
NRC VIOLATION 390/93-63-04

TVA RESPONSE 390/93-63-04

TVA concurs with the violation.

REASON FOR THE VIOLATION

This violation occurred as a result of TVA's failure to provide adequate oversight and control over field configuration changes associated with the Unit 1/Unit 2 interface program during major ongoing construction activities. TVA's investigation revealed this problem encompassed additional Unit 1/Unit 2 interface boundary points that were in conflict with the latest design output. Ongoing work activities were not fully addressed during the field implementation of work documents associated with establishing the interfaces. The implementation and verification of interfaces took credit for the fuses already removed without ensuring that the ongoing work activity was modified to prevent reinstallation of the fuses. At the time of these occurrences, no program was in place to flag the point as a Unit 1/Unit 2 interface boundary or identify that the fuses should not be reinstalled. Also, there was no process in place to ensure the transfer of each Unit 1/Unit 2 interface boundary point to Operations.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

As an initial corrective action, work which involved establishing new Unit 1/Unit 2 interfaces was suspended until appropriate actions to prevent recurrence were established. These violation examples have been documented in SCAR WBSA930015, Revision 1. (This SCAR also includes several actions taken that are not applicable to this violation).

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

To address TVA's failure to provide adequate oversight, Site management assigned overall responsibility for the Unit 1/Unit 2 Interface Program to a single Operations manager to ensure proper focus and accountability for the coordination, implementation, and effectiveness of the interface program.

To address TVA's failure to provide adequate control over field configuration changes associated with the Unit 1/Unit 2 interface program, TVA issued or revised the following procedures.

- Plant Administrative Instruction (PAI)-2.05 has been issued to require that a unique identification tag be placed on appropriate interface points by Operations before transfer of that system from Startup to Operations (SPOC-1). Additionally, this procedure establishes controls to be used for modifying a Unit 1/Unit 2 interface point. To ensure that system interface points have been transferred to the plant and brought under the requirements of PAI-2.05, PAI-2.05 was revised to require a final, pre-fuel load, review of interface points established against the design calculations requiring the interface points.

ENCLOSURE 1  
WATTS BAR NUCLEAR PLANT UNIT 1  
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- PAI-5.01, "System Preoperability Checklist," has been revised to require Operations verification that the requirements of PAI-2.05 have been met before plant acceptance of a system.
- Engineering Administrative Instruction (EAI) 3.07, "System Plant Acceptance Evaluation," has been revised to require the issuance of a list of the interface points on a given system at System Plant Acceptance Evaluation (SPAЕ)-II (engineering, construction, and testing completion) to aid plant Operations in meeting the requirements of PAI-2.05.

TVA will identify any interface points that are, or should be, within the transfer boundaries of systems that were turned over to the plant before implementation of PAI-2.05. These points will be tagged with a unique interface card in accordance with PAI-2.05 requirements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA is currently in compliance with the interface points on systems that have been transferred to the plant since the implementation date of PAI-2.05 (November 1, 1993).

TVA will be in full compliance by April 5, 1994 for those systems that were transferred to Operations before implementation of PAI-2.05.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
VIOLATION 390/93-63-04

LIST OF COMMITMENTS

93-63-04

1. TVA will identify any interface points that are or should be within the transfer boundaries of systems that were turned over to the plant before implementation of PAI-2.05. These points will be tagged with a unique interface card in accordance with PAI-2.05 requirements. TVA will be in full compliance by April 5, 1994.