

111

FEB 17 1994

Tennessee Valley Authority

2

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FEB 17 1994

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3

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ENCLOSURE

The NRC staff has completed a review of your response to the Notice Of Violation documented in Inspection Report 50-390, 391/93-70 and determined that additional information is needed in order to determine compliance with the requirements of 10 CFR 2.201. The staffs review determined that your response warrants clarification in the following areas:

1. Regarding the response to Violation A (390/93-70-01) in your December 14, 1993 submittal, the paragraph listed on page E1-2, titled "Corrective Steps That [Have] Been Taken And Results Achieved", you concluded that "Based on the review of work plans and personnel interviews, the extent of condition is believed to be limited to the subject supports". Please provide your basis for this belief and assurance that the extent of condition is limited to the subject supports.
2. In both your initial and supplemental responses to Violation 390/93-70-01 and Violation B (390/93-70-02) you indicate memorandums were issued to correct the various nonconforming conditions. Since memorandums are not considered a QA controlled document and generally have a very limited time span effectiveness, please provide information stating how TVA is assuring continued compliance with the memorandums. Please indicate whether the training provided as corrective actions for these violations was one time only or has been incorporated into the WBN training program.
3. Regarding your response to Violation 390/93-70-02, and as listed on page E2-2, titled "Reason For The Violation", you indicate the violation for examples 1,3 and 4 occurred as a result of personnel error caused by inadequate training. Further, in a documented submittal to the NRC dated July 20, 1993 titled "Quality Assurance Effectiveness At WBN" you advised us that "The ... line organizations depend on QA as the last barrier of defense and expects QA reviews, monitors, and inspections to achieve the required level of quality rather than the line organizations themselves assuming the prime responsibility for quality". In the same July 20, 1993 response, you indicate "Additionally, the WBN line organizations are developing an action plan which will increase the emphasis on line management accountability for the achievement of quality performance." Please provide information stating when compliance was achieved, or will be achieved, regarding implementation of the subject "action plans" and whether these action plans include training that should prevent this violation from reoccurring. In addition to the actions initiated by the line, what action was or is being done by the WBN QA Organization to assure the line organizations still are not relying on QA to achieve the required level of quality?

4. On page E2-3 of the response letter, you indicate a memorandum will be issued stressing the importance of ensuring that data sheets are updated per the current procedures. Since this memorandum apparently was not issued between the time the NOV was issued on November 12, 1993 and the date of your response, December 14, 1993, please provide information stating how compliance was assured during the interm 30 day period. Were any data sheets being processed regarding this issue during this time period? Further, as required by 10 CFR 2.201, when will full compliance be achieved regarding issuing this memorandum and other stated corrective actions for Violation 50-390/93-70-02? The letter stated that full compliance will be achieved when PER WBPER930338 is completed. The letter indicates the PER had a completion date of December 31, 1993. Currently, the PER has a completion date of June 29, 1994 and your supplemental response states the subject PER has been rescheduled for completion to coincide with the system turnover. Please provide a specific date when full compliance will be achieved for this Violation.
5. On page E2-3, your response stated that "In addition, TVA is considering generally broader procedural issues." Please provide more details concerning what procedure changes are being considered and how they relate to or affect the corrective actions already taken.
6. The response letter dated December 14, 1993 contains a statement that TVA concurs with Violation 50-390/93-70-02. However in the supplemental response you include a statement "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 ... 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." Please clarify the intent of this supplemental statement. Is the supplement a denial of the violation or a clarification that QC inspections would not be expected to detect a violation of requirements when the field engineer made a mistake on field data sheets? We concur with your statement in the next paragraph that indicates it is the responsibility of the work instruction preparer to provide correct requirements in the work instructions. However, your July 20, 1993 letter indicated this responsibility was not being accepted by the line organizations, rather the line organization was relying on QC to ensure quality. To assure procedural compliance, as committed to in the December 14, 1993 response, is SSP 3.01 being revised to require the QC inspector to assure procedural compliance rather than allowing reliance on the data sheets?