



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

William J. Museler
Site Vice President, Watts Bar Nuclear Plant

MAR 15 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) 50-391

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - NRC INSPECTION REPORT NO. 390/94-05,
REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of Violation 390/94-05-01 cited in the subject inspection report dated February 19, 1994. The violation identified the failure by TVA to index Weld Map Change requests (WMCRs) in the Document Distribution System (DDS). This resulted in Document Control and Records Management (DCRM) being unable to issue controlled copies of Weld Maps with the appropriate WMCRs. The enclosure to this letter addresses the violation as described in the inspection report and the corrective actions taken by TVA.

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

9403240157 940315
PDR ADOCK 05000390
G PDR

LEO
11

MAR 15 1994

cc (Enclosure):

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
WATTS BAR NUCLEAR PLANT UNIT 1
RESPONSE TO NRC'S FEBRUARY 19, 1994 LETTER TO TVA
NRC VIOLATION 390/94-05-01

DESCRIPTION OF VIOLATION 390/94-05-01

10 CFR 50, Appendix B, Criterion VI, requires that measures be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto.

Paragraph 6.2.A. of TVA-NQA-PLN89-A, Revision 4, Nuclear Quality Assurance Plan, which implements 10 CFR 50, Appendix B, Criterion VI, requires that, "Master document indexes shall be established and maintained for identifying all controlled documents and their revision status. The distribution of documents shall be controlled and maintained to assist in preventing the use of obsolete or superseded documents."

Procedure SSP-2.07, Revision 5, Document Control, requires that, "Controls shall be established for maintaining controlled documents to ensure accountability so the inadvertent use of voided or SUPERSEDED documents is minimized."

Contrary to the above, on January 25, 1994, Weld Map Change Requests (WMCRs) were not indexed in the Document Distribution System (DDS) and there was not an accurate index of WMCRs in the Technical Information Center (TIC). This resulted in Document Control and Records Management (DCRM) being unable to issue controlled copies of Weld Maps to avoid inadvertent use of voided or superseded Weld Maps. Numerous superseded WMCRs were in the TIC, available for use.

TVA RESPONSE

TVA concurs with the violation.

REASON FOR THE VIOLATION

The subject violation occurred because personnel from the Welding Engineering Unit and DCRM failed to communicate the extent of control appropriate for WMCRs. SSP-2.07 requires the ORIGINATING ORGANIZATION to identify specified documents to DCRM requiring control. DCRM in conjunction with the ORIGINATING ORGANIZATION, determines which documents are to be controlled and how those controls will be implemented. Although the Weld Maps and WMCRs were being controlled as Quality Assurance (QA) records, the WMCRs were not being indexed into DDS. Since the WMCRs were not posted against the Weld Map or entered into DDS, the Weld Map user and DCRM were unable to determine which WMCRs were outstanding against the current revision of the Weld Map.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The retention and distribution of Weld Maps and WMCR's is now similar to the controls in place for other documents used to complete work activities. In accordance with SSP-2.07, Weld Maps and WMCRs are transmitted on a Document and Record Release Form to the DCRM Distribution section. The Weld Maps are entered

into DDS, microfilmed on aperture cards, and distributed to the DCRM Technical Information Center on a transmittal form. The WMCRs are entered into DDS against the appropriate Weld Map(s), copied, and distributed to the TIC. The original WMCR's are sent to the DCRM Records Processing section for microfilming and indexing into RIMs. When WMCRs are incorporated into a Weld Map revision DDS is updated and the incorporated WMCRs are removed from the TIC active file.

A current set of Weld Map aperture cards has been filed at the TIC. If the revision level of any aperture card does not agree with the Document Distribution System, a controlled Weld Map cannot be issued. In addition, a copy of the current WMCR that matches DDS is available at the TIC. If the TIC does not have the required WMCR copy, a controlled copy of the Weld Map cannot be issued until the discrepancy is resolved.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

To determine if other documents used to perform work were not adequately controlled in the DCRM program, TVA solicited site organizations to review their program area. Each organization completed a review to ensure that the documents generated are controlled in accordance with SSP-2.07. This review identified one additional discrepancy with the control of a field test manual issued by Corporate, that has been corrected.

In addition, TVA completed an assessment of Document Control in accordance with SSP-2.07 to determine if any conditions similar to the subject violation existed. This assessment identified that the Preservice Inspection (PSI) drawings were being sent to DCRM, but the DDS program did not include all of the drawings. A review determined that the original drawings transferred from corporate to the site in 1991 had not been entered into DDS. Thereafter, distribution responsibilities were transferred to the site with subsequent revisions and new issues being entered into DDS. This deficiency did not impact the field inspections completed on or before May, 1991 since such inspections were completed in accordance with the drawings maintained by corporate. Preservice inspections after May, 1991 were completed using the drawings obtained from DCRM which reflected revised or new issued drawings. DCRM has now updated DDS to reflect the latest PSI drawings. This assessment did not disclose any additional deficiencies.

An evaluation was also made to determine if the failure to control WMCRs and issue controlled Weld Maps could have impacted the results of hydrostatic tests, walkdowns, inspections, or other activities associated with the N-5 review. TVA determined that the process necessary for completing these activities would have precluded any negative impact on the results. N-5 related activities were processed by the Welding Engineering Unit utilizing the original Weld Maps and associated WMCRs as well as documents obtained from the TIC. In those cases where documents were obtained from the TIC, the common practice was to compare the TIC document with the original Weld Map and WMCRs retained by the Welding Engineering Unit if any discrepancies were identified.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA is currently in full compliance.