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OCT 24 1997

U.S. Nuclear Regulatory Commission
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10 CFR 2.201

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket No. 50-390

**WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - NRC INSPECTION REPORT
NO. 50-390, 391/97-06 - REPLY TO NOTICES OF VIOLATION (NOVs)**

This letter provides TVA's reply to NOVs 50-390/97-06-01 and 50-390/97-06-07 which are documented in the subject inspection report dated September 25, 1997. Enclosure 1 provides TVA's response to the NOVs. NOV 50-390/97-06-01 documents a condition where the outside air temperature was not monitored properly to ensure the operability of the emergency diesel generators. NOV 50-390/97-06-07 documents a condition where a Personnel Contamination Event Report was not initiated as required by Radiological Control Instruction (RCI) 102, "Contamination and Hot Particle Control." Enclosure 2 lists the commitments made in this letter.

If you should have any questions, please contact P. L. Pace at (423) 365-1824.

Sincerely,


J. A. Scalice

Enclosure(s)

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U.S. Nuclear Regulatory Commission
Page 2

OCT 24 1997

cc (Enclosure):

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1

INSPECTION REPORT NUMBER 50-390/97-06
REPLY TO NOTICE OF VIOLATION (NOV)

I. RESTATEMENT OF VIOLATION 50-390/97-06-01

"Technical Specification 5.7.1.1 requires that written procedures be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. This includes procedures for system operations and inspections.

Contrary to the above, on August 25, 1997, adequate procedures were not implemented to verify that Diesel Generator room environmental conditions were met in that outside air temperature compared to various room fan conditions was not verified during worst case conditions."

TVA's REPLY TO VIOLATION 50-390/97-06-01

1. Reason For The Violation

System Operating Instructions (SOIs) for the emergency diesel generators (EDGs) provide ambient temperature restrictions for the performance of maintenance on the exhaust and panel fans. However, the operating procedures did not contain information such as where the outside air temperature was to be monitored, how it was to be monitored, and how often the temperature was to be monitored. The lack of this guidance resulted in the temperature erroneously being taken from inside the EDG building.

2. Corrective Steps Taken And Results Achieved

As a result of actions previously taken for LER 390/97-013, Operations revised the series of Surveillance Instructions (SIs) which control shift and daily surveillance requirements during the different mode conditions. Operations also revised 1-SI-0-2-00, "Shift and Daily Surveillance Log Master," to include the addition of Data Sheet 66, "ERCW Supply Temperature vs. Ambient Air Temperature." The mode specific instructions were revised to require that a control room operator be notified if any of the exhaust fans or the panel fans were found to be out-of-service during operator rounds. Once notified the control room operator determines if Data Sheet 66 of 1-SI-0-2-00 needs to be performed. Once the data sheet is initiated, Operations currently performs it twice a shift and logs the ERCW temperature data from either a P2500 computer point or a data point from the Emergency Response Facility Data System (ERFDS). Operations also reads the ambient air temperature from ERFDS by means of the ten meter data point on the meteorological tower. If the ambient air data point is not available from ERFDS, then 1-SI-0-2-00 requires Operations to take the temperature readings from the roof of the EDG building with a digital thermometer. The recording of the temperature data will continue until the equipment is returned to service.

3. Corrective Steps That Will Be Taken To Prevent Recurrence

Operations has concluded that the best method to control the releasing of a generator and electrical panel fan or a diesel room exhaust fan for maintenance is to establish a standard clearance program for these components. Operations currently controls the clearance process as part of a computerized program called the Nuclear Operations Management System (NOMS). Once established, the standard clearances may be accessed by the applicable component identifier (e.g., the identifier for the fan or breaker) for which maintenance is planned. The intent of the

3. Corrective Steps That Will Be Taken To Prevent Recurrence (continued)

development of standard clearances is to provide the operations staff with a clearance which is unique to specific components. This will allow for the clearance to be used repeatedly for maintenance on the same components once the standard clearance is approved.

The standard clearances will contain cautions which require that the outside air temperature be checked against the criteria specified in the SOIs to determine whether the maintenance activity will require entry into limiting condition for operation (LCO) 3.8.1 and performance of surveillance requirement (SR) 3.8.1.1. In addition, Operations will revise Site Standard Practice (SSP) 12.03, "Equipment Clearance Program," to require that the standard clearances be reviewed whenever a clearance is being initiated. This will ensure that the standard clearances are used whenever they are applicable. The development of the standard clearances and the revision of SSP-12.03 will establish adequate controls to ensure that similar problems do not occur in the future.¹

Further action that will be taken by Operations on this issue includes an assessment of the procedural impact of a Design Change Notice (DCN) being developed by Engineering. This DCN documents the results of a special test performed on an EDG to establish temperature values which better represent actual operating conditions. As part of the assessment of the DCN impact, Operations will determine if during periods of continuous hot weather, the temperature monitoring should be performed more than twice a shift.

¹ The method of controls using standard clearances was established in response to NOV 390/97-06-01 following closure of the associated Problem Evaluation Report (WBPER970857).

4. Date When Full Compliance Will Be Achieved

TVA will complete the above actions by January 9, 1998.

II. RESTATEMENT OF VIOLATION 50-390/97-06-07

"Technical Specification 5.7.1.1 requires that written procedures shall be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. This includes procedures for control of radioactivity.

Radiological Control Instruction (RCI) 102, Contamination and Hot Particle Control, Revision 1, required documentation of skin and personal clothing contaminations greater than 100 counts per minute (CPM) when surveyed with a 15.5 cm² frisker probe.

Contrary to the above, on July 17, 1997, technicians failed to document an incident of shoe contamination where an assistant unit operator contaminated his shoe to a level of 450 CPM above background."

TVA's REPLY TO VIOLATION 50-390/97-06-07

1. Reason For The Violation

The cause of the violation is personnel error. This event occurred when water from a sample sink in the Cask Decontamination Collector Tank area spilled on the floor contaminating the right shoe of an Operator in the area. This event took place during a period when the Radiation Control (Radcon) Shift Supervisor (RCSS) was the only person manning the Radcon laboratory. Other ongoing work activities taking place at the same time as the contamination event also required the

1. Reason For The Violation (continued)

immediate attention of the RCSS. In responding to all the activities, the requirement of RCI-102 for the initiation of a Personnel Contamination Event (PCE) was overlooked by the RCSS.

2. Corrective Steps Taken And Results Achieved

The immediate action taken by Radcon was the initiation of PCE 97-033 to document the contamination event. Radcon management also took action to reiterate their expectations regarding proper self-checking and procedural adherence in a meeting with the RCSS involved in this event.

3. Corrective Steps That Have Been Taken To Prevent Recurrence

Radcon management assigned the RCSS with the task of developing a presentation covering the importance of procedural compliance and the importance of properly documenting contamination events. This action was taken as a measure to assure Radcon personnel, both TVA and contractor, understood this issue and the importance of procedural compliance. The involved RCSS completed the presentation of this information to the Radcon staff on September 3, 1997.

4. Date When Full Compliance Will Be Achieved

With respect to the cited violation, TVA is in full compliance.

ENCLOSURE 2
TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1

INSPECTION REPORT NUMBER 50-390/97-06

LIST OF COMMITMENTS

1. The standard clearances will contain cautions which require that the outside air temperature be checked against the criteria specified in the SOIs to determine whether the maintenance activity will require entry into LCO 3.8.1 and performance of SR 3.8.1.1.
2. Operations will revise Site Standard Practice (SSP) 12.03, "Equipment Clearance Program," to require that the standard clearances be reviewed whenever a clearance is being initiated. This will ensure that the standard clearances are used whenever they are applicable.
3. As part of the assessment of the DCN impact, Operations will determine if during periods of continuous hot weather, the temperature monitoring should be performed more than twice a shift.