



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

JAN 20 1995

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) - NRC INSPECTION REPORT NO. 50-390/94-78,
50-391/94-78 - REPLY TO NOTICE OF DEVIATION

The purpose of this letter is to provide TVA's reply to Notice of
Deviation 390, 391/94-78-01 cited in the subject inspection report dated
December 21, 1994. The deviation concerned documenting work on the fire
detection system. TVA's response to the deviation is contained in
Enclosure 1.

As discussed in the Fire Protection Meeting on December 14, 1994, TVA is
revising the Fire Protection Report to address review comments discussed
in that meeting. That revision will also address recently identified
issues of drawing discrepancies and equipment capabilities.

There are no new commitments contained in this submittal. If you should
have any questions, contact Mr. P. L. Pace at (615)-365-1824.

Sincerely,

Dwight E. Munn
Vice President
New Plant Completion
Watts Bar Nuclear Plant

Enclosure
cc: See page 2

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cc (Enclosure):

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ENCLOSURE
WATTS BAR NUCLEAR PLANT (WBN)

NRC INSPECTION REPORT 50-390, 391/94-78
RESPONSE TO DEVIATION 50-390, 391/94-78-01

DESCRIPTION OF DEVIATION

"During an NRC inspection conducted on November 14 - 18 and November 28 - December 1, 1994, a deviation from written commitments was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2 Appendix C, the deviation is listed below:

TVA's Fire Protection Report commits to Quality Assurance measures including procedural adherence for the fire protection program.

Site Standard Practice SSP-6.07, Control of Measuring and Test Equipment, Section 2.4.D states that the work document, number of work document, equipment identification, or description of the intended use shall be provided by the user at the time of measuring and test equipment checkout.

Site Standard Practice SSP-10.04, Material Issue, Control and Return, Section 2.3.2, states that uninstalled QA Level I, II or III materials may be reassigned to a different work authorizing document than that referenced on the original Nuclear Storeroom Requisition Form No. TVA 575N. However, this shall be accomplished through the completion of a Material Transfer Document.

In deviation from the above, on or about November 19, 1993, TVA did not adhere to these requirements while performing repairs to Fire Detection Panel O-L-620 by work request No. C183358 in that:

- (1) New wiring with terminal lugs which were crimped to the wiring were installed using incorrectly issued tools. Two crimp tools and a dial caliper were drawn from tool issue erroneously using Work Request No. C235516 in lieu of Work Request No. C183358 which was used to perform the task.
- (2) A battery was installed in Fire Detection Panel O-L-620 which had been issued for installation in Panel O-L-601 and a materials transfer document was not issued to authorize the transfer or reassigning of this battery as required by SSP 10.04."

TVA RESPONSE

TVA admits the deviation.

REASON FOR THE DEVIATION

The deviation occurred due to personnel error that resulted from a lack of training. Fire Protection personnel were unfamiliar with the specific documentation requirements associated with transferring materials or measuring and test equipment (M&TE) from one work document to another.

The battery and M&TE equipment (crimp tools and dial caliper) were originally intended to be used on equipment that was being worked under different work authorization documents. In late 1993, Fire Protection personnel attached copies of the original documentation used to withdraw the battery and M&TE to Work Request (WR) No. C183358 rather than fill out the appropriate forms.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

The 1993 documentation errors identified by the inspector represent examples of Fire Protection section documentation problems that were identified by TVA in February 1994. Quality Assurance (QA) personnel identified similar documentation deficiencies during a February 1994 assessment and initiated corrective action document number WBFIR940021. TVA added the material transfer documentation deficiency identified by the inspector to WBFIR940021 under the FIR's extent of condition. TVA determined that the corrective actions taken under WBFIR940021 were sufficient to address the cause of documentation errors identified by the inspector. The corrective actions taken include:

- Fire Protection Shift Supervisors (FPSSs) and the Fire Protection Manager were trained on work documentation requirements and review responsibilities, particularly those associated with Form 575N usage.
- Fire Protection personnel reviewed WBFIR940021 to familiarize themselves with the problems identified.

The 1993 M&TE usage documentation error is an additional example of the concerns that were identified by NRC in Inspection Report 50-390, 391/94-48 dated July 27, 1994, and addressed in TVA's August 26, 1994, response to Notice of Violation 50-390, 391/94-48-01. The corrective actions described in TVA's response to the violation are considered adequate to address the M&TE documentation deficiency identified by the inspector. These corrective actions included:

- Implementation of a new computer tracking system to increase the reliability and accuracy of the M&TE usage log.
- Issuance of an "Issue Ticket" for each work implementing document to provide information to the user and add a barrier against unreported use.
- Training of work document reviewers to ensure they were aware of the requirements in Site Standard Practice (SSP)-6.07, "Control of Measuring and Test Equipment."

The appropriate documentation was completed by November 16, 1994 (i.e., Material Transfer Document for the batteries and M&TE Late Entry Form for the applicable crimp tool).

The crimp tools and dial caliper were determined to be in tolerance following the work performed under WR No. C183358.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

TVA considers that the corrective actions previously taken are adequate to prevent recurrence. A further extent of condition review to identify and correct potential documentation errors in other archived fire protection records is not considered necessary. The underlying need for the material and M&TE traceability requirements in SSP-6.07 and SSP-10.04, "Material Issue, Control and Return," is to ensure that safety-related components with a defect can be found. The documentation errors identified in the deviation concern fire protection replacement items and equipment that are not safety-related. As such, they are not subject to the underlying traceability requirements associated with safety-related components.

DATE WHEN CORRECTIVE ACTIONS WILL BE COMPLETED

Corrective actions are complete.