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

FEB 2 4 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, 391/94-73 - REVISED RESPONSE TO NOTICE OF DEVIATION

The purpose of this letter is to clarify TVA's January 4, 1995, response to Notice of Deviation 50-390/94-73-03 cited in the subject inspection report. This also responds to NRC's letter dated January 27, 1995.

As noted in NRC's letter, TVA initially only implemented the interim Westinghouse guidelines for prevention of a dilution event. In lieu of implementing the Westinghouse interim guidelines for mitigation of an event, TVA implemented a series of actions prior to initiating the Westinghouse recommendations. Westinghouse approved TVA's use of these actions in a letter dated November 3, 1994. With this approval, TVA's procedures addressing a boron dilution event now comply with the latest Westinghouse guidelines.

Enclosure 1 to this letter contains the revised response to the deviation. Enclosure 2 list the commitment made in this letter.

If you should have any questions, contact P. L. Pace at (615)-365-1824.

Sincerely,

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

Enclosures
cc: See page 2

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Enclosures
cc (Enclosures):
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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1
RESPONSE TO NRC'S JANUARY 27, 1995, LETTER TO TVA
REVISED RESPONSE TO NRC'S DECEMBER 5, 1994, LETTER TO TVA
NRC DEVIATION 50-390/94-73-03

DESCRIPTION OF DEVIATION, 50-390/94-73-03

"In the enclosure to 10 CFR 50.55(e) Final Report WBN NEB 8010, Possible Inadvertent Boron Dilution, dated June 9, 1982, TVA stated that they had reviewed the Westinghouse recommended operating procedures to prevent or mitigate an inadvertent boron dilution at shutdown and committed to revise the appropriate Watts Bar operating instructions by January 2, 1983, to incorporate the procedures.

In deviation from the above, as of November 4, 1994, Watts Bar Abnormal Operating Instruction (AOI) 34, Immediate Boration, had not been revised to incorporate the Westinghouse operating procedures."

ADMISSION OF DEVIATION

TVA agrees with the deviation as stated.

REASON FOR THE DEVIATION

The reason NRC was not notified of changes in the method of implementing the Westinghouse recommendations is not known. Primarily, this is due to the age of this issue.

The condition which is addressed in the Notice of Deviation is the difference between the July 8, 1980, Westinghouse recommendations and the operator actions currently defined in the TVA procedures for response to an identified dilution event. Specifically, the actions include boration using the normal boration flow path and/or the emergency boration flow path prior to utilizing the Refueling Water Storage Tank (RWST) flow path as described in the July 8, 1980, letter. The basis for implementing these actions prior to implementing the recommended Westinghouse action is that there is a higher concentration of boric acid available to be injected to the charging pump suction through these flow paths. Initiation of this action was also considered appropriate due to the time available for the operator to respond to the event, approximately 15 minutes. This sequence of response actions has been endorsed by Westinghouse in a letter dated November 3, 1994.

Although the initial portion of the Westinghouse recommendations regarding the prevention of an event were implemented, the overall commitment to implement both the preventative and mitigation actions was not implemented as stated. TVA should have supplemented the final report to CDR 50-390, 391/80-80 to define the additional operator actions which TVA incorporated to address this event.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER DEVIATION

The need to ensure continuing conformance to programmatic commitments has been previously documented and was included as an element of the Design Baseline and Verification Program (DBVP) Corrective Action Plan (CAP). Specifically, the verification and control of commitments is addressed in the Licensing Verification area of the CAP. These corrective measures were developed to address issues such as the cited deviation and to ensure that adequate controls are in place to ensure ongoing conformance to programmatic commitments.

Although the DBVP had identified the 1980 commitment, it cannot be confirmed that both the preventative and mitigative elements of the commitment would have been recognized. Accordingly, TVA will check a sample of commitments which have completed the DBVP verification process to confirm proper implementation. If required, adjustments to the implementation of this element of the DBVP CAP will be made.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the deviation example, TVA is in full compliance. The sample of completed commitments discussed above will be completed by April 14, 1995.

ENCLOSURE 2

SUMMARY OF COMMITMENTS

1. Although the DBVP had identified the 1980 commitment, it cannot be confirmed that both the preventative and mitigative elements of the commitment would have been recognized. Accordingly, TVA will check a sample of commitments which have completed the DBVP verification process to confirm proper implementation. If required, adjustments to the implementation of this element of the DBVP CAP will be made.