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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 14, 1994

Tennessee Valley Authority
ATTN: Mr. Oliver D. Kingsley, Jr.
President, TVA Nuclear and
Chief Executive Officer
6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: INSPECTION OF THE REPLACEMENT ITEMS PROGRAM (RIP) CORRECTIVE
ACTION PROGRAM (CAP) PLAN AT THE WATTS BAR NUCLEAR PLANT, UNIT 1
(NRC INSPECTION REPORT NO. 50-390/94-201)

Dear Mr. Kingsley:

This letter transmits the report of the U.S. Nuclear Regulatory Commission (NRC) inspection, conducted by Robert Pettis, Jr., Larry Campbell, Stephen Alexander, of the Special Inspection Branch, and Juan Peralta of the Quality Assurance and Maintenance Branch, of the Office of Nuclear Reactor Regulation (NRR), and Ronald Gibbs and William Bearden of NRC Region II. The inspection was conducted to review the implementation of the Tennessee Valley Authority (TVA) Replacement Items Program (RIP) Corrective Action Program (CAP) for the Watts Bar Nuclear Plant (WBN), Unit 1.

The inspection, conducted June 20 through 24, July 5 through 8, and July 18 through 20, 1994, was performed at the 75-percent completion stage of the RIP CAP Plan and was related to activities at the plant site authorized by NRC Construction Permit CPPR-91. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed inspection report. Areas examined during the inspection are identified in the report. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Subsequent to the onsite portion of the inspection, TVA continued to provide information for the inspectors to review to help close out several issues that remained unresolved at the time of the exit meeting. These reviews occasioned several telephone conversations with TVA and the submission of additional information in response to questions raised during review of the supplementary submittals. The last of this information was received by the inspectors on November 7, 1994. The review of this material was completed and the appropriate report sections revised accordingly.

In general, the inspection team determined that the RIP CAP activities were effective and that significant improvements had been made. However, deficiencies regarding program implementation were identified. For example, during the review of the Material Improvement Project, numerous instances were

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identified where material had been installed without performing a review for suitability, since the affected items were not tracked by the RIP data base as an outstanding work item. During the inspection, TVA initiated an evaluation which determined that 84 of a total of 158 sanitization packages (the sanitization process involved reviewing the adequacy of an item's documentation), identified for further evaluation under the RIP, had not been entered into the RIP data base and therefore, had not been evaluated for their intended safety-related applications.

The inspection team also identified several instances where inadequate commercial grade dedication was performed for installed material (i.e., circuit breakers and related components). The deficiencies appeared to reflect a less than full understanding among some procurement engineers of the design basis requirements of the various Watts Bar electrical distribution systems. The inspection team also identified the failure to perform adequate corrective action for equipment which failed in service and the failure to follow TVA procedures.

During the review of Revision 5 to the RIP CAP Plan, the inspection team determined that many elements of it were conducive to general improvement of the procurement and material control programs at WBN. However, Revision 5 itself (as had been the case with Revision 4), as a stand alone document, expresses positions (e.g., in Note 2 of the Introduction) that are not consistent with the requirements of Appendix B to 10 CFR Part 50 and the staff positions stated in NRC Generic Letters 89-02 and 91-05, where the staff positions differ from Electric Power Research Institute (EPRI) EPRI NP-5652.

As written, Revision 5 to the RIP CAP would not ensure that all material, particularly commercial grade items, would be adequately rendered suitable or verified to be suitable for specific safety-related plant applications under all design basis conditions. However, these differences from staff positions were not reflected, in general, in the implementing procedures that were actually in use for procurement and dedication activities; although the procedures did contain some less significant deficiencies as noted in this report. Therefore, the staff requests that you revise and docket a RIP CAP Plan to reflect the actual procurement practices in-place at WBN.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room. No response to this letter is required. The NRC Region II Office will issue any enforcement actions resulting from this inspection.

December 14, 1994

Should you have any questions concerning this inspection, please contact the NRR Project Manager Peter Tam at (301) 504-1451 or the inspection team leader Robert Pettis at (301) 504-3214.

Sincerely,

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Steven A. Varga, Director
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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