



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

O. J. "Ike" Zeringue
Senior Vice President, Nuclear Operations

JUN 09 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

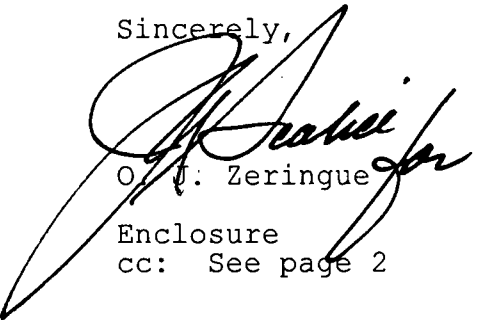
WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2 - NRC INSPECTION REPORT
NO. 50-390, 391/95-18 - REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of Violation 50-390/95-18-02. This notice of violation identified three examples of failure to follow procedures associated with the implementation of a design change notice. TVA's reply to the notice of violation is provided in the Enclosure to this letter.

No commitments were made in this letter.

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

Sincerely,


O. J. Zeringue

Enclosure
cc: See page 2

9506150244 950609
PDR ADOCK 05000390
Q PDR

JED

U.S. Nuclear Regulatory Commission
Page 2

JUN 09 1995

Enclosure

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 UNITS 1 AND 2
REPLY TO NOTICE OF VIOLATION (NOV)
NOV 50-390/95-18-02

NOTICE OF VIOLATION 50-390/95-18-02

"10 CFR 50, Appendix B, Criterion V, as implemented by Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 4, Section 6.1, requires that quality-related activities shall be accomplished in accordance with documented procedures and instructions appropriate to the circumstances.

Site Standard Practice SSP-9.54, Return to Service and Closure of Modifications, Revision 8, Section 2.4, Initiation of Modification turnover Package, Step Q under Operations states: "review Impact Review Form items against the final as-built condition and final design requirements. (Review relevant F-DCNs, 10 CFR 50.59 Review revisions, and so forth.)"

Engineering Administrative Instruction EAI-3.05, Design Change Notices, Revision 21, Section 5.5, Advanced Authorizations, Step 5.1.1, Limitations, states in part, "... advance authorizations of F-DCNs shall not be used to change system logic, function, performance, or operation."

Engineering Administrative Instruction EAI-3.05, Section 5.1, DCN Initiation and Approval, Step 5.1.6.a, under the criteria for a Work Design change Notice, states in part, "... has no impact on Design Bases Documents or FSAR text ..."

Contrary to the above, three examples of failure to follow procedures were identified as follows:

- 1) Safety injection system Design Change Notice DCN W-31677-A, including Design Change Notice DCN F-34568-A, was closed without the required operating procedure changes being identified on the Operation Impact Review form. Consequently, the safety injection system operating instruction was not revised to address the addition of valves added by these Design Change Notices.
- 2) Advanced Authorization AA-01 Field Design Change Notice F-34568-A changed the function of safety injection system valve DRV-63-518 in that the required valve position was changed from a normally closed drain valve to a normally open pressure relief path.
- 3) Design Change Notice DCN W-31677-A was approved as a Work Design Change Notice. This Design Change Notice required a change to Safety Injection System Design Basis Document system description in that the wording was changed on the method of preventing pressure locking of hot leg safety injection valve FCV-63-172."

TVA RESPONSE

TVA agrees that the examples identified in the violation occurred.

Reason For The Violation

Example 1: Since DCN F-34568-A had been advanced authorized, the preparer and design verifier incorrectly assumed that no impact to system operation would result or that it

would have been considered in conjunction with advanced authorization of the F-DCN or W-DCN which issued the initial change. Additionally, the authorizing engineer did not recognize the operational impact of the AA F-DCN.

Example 2: The specific words in Engineering Administrative Instruction (EAI)-3.05 may have led DCN preparers to the conclusion that component function/operation changes could be advanced authorized by F-DCNs.

Failure of the authorizing engineer to recognize the function code change for 1-DRV-63-518 (now 1-ISV-63-518) and use of the relief valve function code for 1-RFV-63-162 (now 1-ISV-63-162) contributed to Operations not identifying required procedural changes.

Example 3: When the DCN was approved for initiation, the DCN approver was not aware that Design Basis Document (DBD) changes were required. The significance of impact on Operations or the DBD change requirement was not apparent in the top half (block 12) of the DCN form.

The DCN preparer did not identify the requirement to change the System Description Document (SDD). The DCN design verifier did identify the requirement to change the SSD. However, during incorporation of the design verifier comments, neither the design verifier nor the preparer recognized that including the SDD change would change the DCN type to a M-DCN.

Corrective Steps Taken And Results Achieved

1. The involved individuals have been counseled.
2. A memorandum has been issued to Nuclear Engineering personnel, emphasizing the need to clearly and completely identify required changes and reference documents when initiating DCNs to support the DCN type determination process.
3. NE personnel involved in preparing, checking, and approving DCNs, and non-NE personnel who are authorized to approve AA DCNs, have performed reading training on the specifics of the corrective actions for this issue (as documented in Problem Evaluation Report WBP950210).
4. Twenty currently advanced authorized F-DCNs to DCNs (10 mechanical and 10 electrical) have been reviewed to determine if additional cases of inappropriate advance authorized F-DCNs have occurred. None were identified.
5. Twenty currently issued (10 mechanical and 10 electrical) W-DCNs were reviewed to determine if additional cases of inappropriate use of a W-DCN have occurred. None were identified.

Corrective Steps Taken To Avoid Further Violations

1. Engineering Administrative Instruction (EAI)-3.05, Section 5.5, has been revised to indicate that restrictions on AA F-DCNs also apply to changes in component function/operation.

2. EAI-3.05, Appendix K, Item 5, has been revised to indicate that only Type S (specification change) and Type M (major modification) DCNs can change DBDs.
3. Site Standard Practice (SSP)-2.54, "Component Identification and Implementation," has been revised to add "self-actuating" to the description for relief valves and indicate in Section 2.8.3, Item 2, that the relief valve function should only be used for self-actuating relief valves.

Date When Full Compliance Will Be Achieved

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