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JUN 30 1995

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U.S. Nuclear Regulatory Commission
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Gentlemen:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 AND UNIT 2 - NRC INSPECTION
REPORT NOS. 50-390, 391/95-27 - REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of
Violation 390/95-27-01 cited in the subject inspection report dated
May 31, 1995.

Enclosure 1 provides TVA's response to this violation.

Enclosure 2 is a list of commitments.

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

Sincerely,



O. J. Zeringue

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 VIOLATION 390/95-27-01

DESCRIPTION OF VIOLATION

"10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, and Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 4, paragraph 6.1.1, require that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

TVA procedure EAI-3.05, Design Change Notices, Revision 18 requires that Q-DCNs disposition questions and provide clarification. Section 4.2 requires that DCNs shall not be used to provide a disposition to a nonconforming condition in lieu of a Significant Corrective Action Report (SCAR) or other Administrative Control Program (ACP). Appendix A, requires in part that appropriate reference documents (including ACP documents, vendor documents, etc.) be entered in block 9 of the Q-DCN form. Appendix M requires that the Q-DCN shall not be used to support changes to the plant, to identify discrepancies, or to support changes to input/output documents.

Contrary to the above, Q-DCNs 35720-A, 21591-A, 22575-A, 35541-A, 32973-A, 34120-A, and 20757-A did not implement the requirements of EAI-3.05 in that they specified changes to design input/output information and accepted nonconforming conditions for the following plant changes; (1) fittings; (2) alternate bolting configurations and torque values for the mounting of Agastat relays; (3) mixed manufacturers conduit hardware for non 1-E systems; (4) response time for a safety related valve which differed from design requirements; and (5) alternate design configurations for cable tray support clips. Further, the Q-DCNs did not reference appropriate TVA corrective action documents, design documents, and supporting information."

TVA RESPONSE

TVA agrees that this violation occurred with exception of Q-DCN 35541-A, which is discussed below.

REASON FOR THE VIOLATION

The violation occurred because TVA engineering personnel misapplied Engineering Administrative Instruction (EAI)-3.05, which requires a Q-DCN to "Disposition questions and provide clarifications." The procedure does not allow Q-DCNs to be used for any other purpose. However, there was a lack of a clear understanding on the proper use of Q-DCNs, and in some cases, questions received by Engineering were responded to without proper consideration that the response might be providing design input/output, discrepancy resolution, or resolution of a procedural deficiency.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

TVA has reviewed each referenced Q-DCN and has addressed them as follows:

DCN Q-20757-A

NRC Finding: (From NRC Inspection Report 390, 391/94-81) "TVA issued DCN Q-20757-A on October 1, 1992 which allowed 7000 series Agastat relays to be mounted with only 2 screws in the six mounting bracket holes and required those screws to be torqued to 12 inch-pounds. The inspector determined that the use of a Q-DCN may not be appropriate because the DCN specified design output information (torquing screws to 12 inch-pounds) and caused work plans to be issued which made changes to plant hardware."

TVA response: TVA concurs that the use of a Q-DCN, without reference to other output documents, was inappropriate in this instance. DCN Q-20757-A has been revised and superseded by DCN S-37134 which has been issued to provide the requirements on the appropriate vendor drawing. In addition, Vendor Technical Manual WBN-VTM-A348-0080, Revision 7, was revised to provide proper torque instructions.

DCN Q-35720-A, 21591-A, and 22575-A

NRC Finding: The Q-DCNs "were written to provide acceptance criteria for damaged piping, fittings, and valve bodies. Q-DCN 35720-A, written for damaged fittings and valve bodies, stated that acceptance criteria contained in Q-DCN 22575-A should be used to disposition physical damage (indentations or impressions, arc strikes, etc.) for all systems. Q-DCN 22575-A provided damage acceptance criteria and referenced a report by Reedy Associates dated April 14, 1983 entitled Specifications for Evaluation and Acceptance of Local Areas of Material, Parts, and Components That are Less Than the Specified Thickness. Q-DCN 211591-A, written for piping, referenced the same Reedy Associates report. The Q-DCNs allowed the disposition for "use-as-is" non-conforming conditions on piping, fittings, and valve bodies based the Reedy associates report rather than TVA design input/output information. Although the inspector found no reason to question the adequacy of the Reedy Associates report, the specification and approval for "use-as-is" of acceptance criteria for design input/output attributes on a Q-DCN or other documents outside TVA's Design Base Documents (DBDs) was contrary to procedural requirements."

TVA Response: TVA concurs that the use of Q-DCN's was inappropriate in these instances. DCN Q-21591-A has been revised with an administrative change to reference S-DCN 3714-A, EAI-8.05, "Analysis Procedure," and EAI-8.15, "Alternate Piping Analysis Procedure for Category I and I(L) Piping." These procedures were revised to include the portions dealing with acceptance criteria for wall thinning as documented in the report from Reedy Associates. These revisions will resolve all three DCNs since the other two DCNs reference DCN Q-21591-A.

Q-DCN 35541-A

NRC Finding: This DCN "was written to evaluate the need to rework/replace mismatched hardware for non-1E 1-hole conduit strap installations for conduit systems in Category 1 structures. The backing plate and conduit strap made by Thomas and Betts could be

mixed with ones made by Appleton, The Q-DCN dispositioned for "use-as-is" mixed 1-hole conduit clamp hardware from different manufacturers."

TVA Response: TVA considers this to be an appropriate use of a Q-DCN. DCN Q-35541-A indicates that walkdown procedure WD-036 and the Category I(L) Conduit Hardware Program addressed this issue and provided acceptance for mismatched manufacturers hardware (clamp and back strap from different vendors). Both the walkdown procedure and the Category I(L) Conduit Hardware Program are part of TVA's Conduit Corrective Action Program (CAP). As such, the Q-DCN did not, itself, provide a "use-as-is" disposition, rather, it references an appropriate document which provides suitable acceptance of the condition.

Q-DCN 32973-A

NRC Finding: This Q-DCN "dispositioned for "use-as-is" five typical cable tray clip detail design configurations that differed from design output documents. The configurations were for cases in which the existence of bolts could not be verified, and tightness could not be verified. The Q-DCN indicated that for the diesel generator building, 9.2% of the bolts inspected (290 out of 3252) were not accessible. Of the 2852 inspected, 56 (2%) required rework. The configurations accepted by the Q-DCN differed from the original design."

TVA Response: TVA concurs that the use of a Q-DCN in this instance was inappropriate. An administrative change to the Q-DCN was implemented to reference the corrective action for Problem Evaluation Report (PER) WBP950106. In this PER, a justification is provided for the acceptability of existing installations for those inaccessible bolts with unacceptable thread engagements.

Q-DCN 34120-A

NRC Finding: This Q-DCN provided "disposition for "use-as-is" a response time for valve 1-FCV-1-51-S that was outside the design output value listed in system description N3-3B-4002. The Q-DCN accepted a response time of 2.002 seconds which was greater than the system description value of 2 seconds. Although the difference was not technically significant, the Q-DCN accepted a value different than original design."

TVA Response: TVA concurs that the use of a Q-DCN in this instance was inappropriate. Also, the evaluation included in this Q-DCN was technically incorrect. Design input used in the evaluation was misinterpreted. The DCN did not document the failure to meet an acceptance criteria, since the test deficiency was written to address not meeting an expected value versus not meeting an acceptance criteria. A PER has been written to document this condition. For the extent of condition for the PER, a review of 20 additional Q-DCNs which involved either the preparer or verifier (10 each) was performed. The results of the review indicate that this was a one-time occurrence. The Q-DCN has been superseded by S-36332-A, which correctly evaluated the test deficiency as acceptable. Additionally, the DCN revised the 003 System Description to prevent recurrence of the improper interpretation of the loss of offsite power required system response.

Each Engineering discipline is reviewing the Q-DCNs for which they are responsible to determine the extent of Q-DCN misapplications. Misapplications of Q-DCNs will be corrected by August 14, 1995, however no physical changes are anticipated.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

As an interim action, a memorandum was issued to engineering employees by the Engineering Manager dated March 9, 1995, to provide caution on improper use of DCNs.

EAI-3.05 has been revised to clarify the requirements for proper use of Q-DCNs. Specific instructions have been added in the text to prevent use of Q-DCNs for design input/output, discrepancy resolution, or resolution of procedural deficiencies.

Training on the proper application of the Q-DCN process has been conducted for engineering personnel (including contractors) who are involved in the preparation of DCNs.

In the inspection report, it was noted that the inspector found several examples where the Q-DCN was referenced by work documents instead of referencing a design output document. TVA considers the actions above to correct the Q-DCN misapplications will resolve any problems associated with the continued use of Q-DCNs in work documents.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the cited violation, TVA will be in full compliance upon completion of the actions stated above. These activities will be completed by August 14, 1995.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNIT 1
RESPONSE TO NRC VIOLATION 390/95-27-01

LIST OF COMMITMENTS

1. Each Engineering discipline is reviewing the Q-DCNs for which they are responsible to determine the extent of Q-DCN misapplication. Misapplication of Q-DCNs will be corrected by August 14, 1995.