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JUL 24 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) - UNIT 1 - NRC INSPECTION REPORT NO.  
50-390, 391/95-30 - REPLY TO NOTICE OF VIOLATION 50-390/95-30-01

The purpose of this letter is to provide a reply to Notice of Violation 390/95-30-01 cited in the subject inspection report dated June 22, 1995. This violation concerns the maintenance of the design configuration for installed plant components, following the performance of required maintenance or calibration activities.

Commitments are discussed in Enclosure 2.

If you have any questions, please 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**

**NRC INSPECTION REPORT NO. 50-390, 391/95-30  
REPLY TO NOTICE OF VIOLATION**

**Violation 50-390/95-30-01**

"10 CFR 50 Appendix B, Criterion III, Design Control, as implemented by the TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, requires that design changes including field changes, shall be subject to design control measures commensurate with those applied to the original design and approved by the organization that performed the original design.

Contrary to the above, as of May 11, 1995, design changes to safety related Bailey Meter Company R-panels had not been subjected to design control measures commensurate with the original design nor approved by the original design organization. Design Change Notices (DCNs) 03053-A and F-33131-A originally installed the seismic clamp bars. Eight panels, including panels 1-L-11A and 1-R-121 which contained instrument modules for the Safety Injection and Main Feedwater systems were identified as not meeting the design configuration of the DCNs. The correct design configuration had been verified by the applicant on April 11, 1995 on the closure verification of significant condition adverse to quality report (SCAR) WBSA 940059."

**TVA Response**

TVA concurs with the violation.

**Reason for the Violation**

Discussions with craft personnel who may have a reason to do work on the auxiliary instrument racks determined that they were not sufficiently knowledgeable of why the clamp bars were installed. Therefore, the apparent reason for this condition was lack of instruction on the purpose of seismic clamp bars for personnel involved in doing the work.

**Corrective Steps That Have Been Taken and The Results Achieved**

Work Orders 950875600, 951804800 and 951804900 were initiated to inspect the remaining cabinets and correct any deficiencies found. TVA has also performed a complete inspection of the Bailey instrument cabinets and has completed the rework necessary to correct any deficiencies.

**Corrective Steps Taken to Avoid Further Violations**

To provide additional clarification for reinstallation activities, drawings have been revised by DCN C-03053 and F-33131 to adequately address installation of the clamp bars. In addition, the Maintenance and Modifications Manager has issued a training letter to all Maintenance and Modifications personnel that may do work on these instrument racks. The training letter instructs personnel to ensure clamp bars are installed in accordance with the approved engineering

drawings, are properly adjusted, and that the gaskets are in place, etc.

The associated corrective action document includes an action to monitor the clamp bar installations to verify long term installation effectiveness. This verification is scheduled to remain in place until management is confident that this issue is resolved.

Also, to prevent recurrence of this condition, periodic training will be conducted on the proper installation of the seismic clamp bars for the auxiliary instrument modules.

No other corrective action is required for this violation.

**Date When Full Compliance Will be Achieved**

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

ENCLOSURE 2

NRC INSPECTION REPORT NO. 50-390,391/95-30  
REPLY TO NOTICE OF VIOLATION

LIST OF COMMITMENTS

1. Periodic training will be conducted on the proper installation of the seismic clamp bars for the auxiliary instrument modules.