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AUG 1 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, 391/95-38 - REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of
Violation 50-390/95-38-01. This notice of violation identified two
examples of failure to follow procedures. TVA's reply to the
notice of violation is provided in the enclosure to this letter.

No new commitments are made in this submittal.

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

Sincerely,


O. J. Zeringue

Enclosure
cc: See page 2

68-008

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Q PDR

JEC

AUG 1 1995

Enclosure

cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
REPLY TO NOTICE OF VIOLATION (NOV)
NOV 50-390/95-38-01

NOTICE OF VIOLATION 50-390/95-38-01

"10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, and TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89A, Revision 4, Section 6.1, require that activities affecting quality be prescribed by documented instructions or procedures and be accomplished in accordance with these instructions or procedures.

Contrary to the above, activities affecting quality were not accomplished in accordance with documented instructions or procedures in the following examples":

EXAMPLE 1

"Site Standard Practice SSP-9.03, Plant Modifications and Design Change Control, Revision 8, Step 2.2.A.4, requires that changes during implementation of a design change notice require the same level of technical review and approval as the original notice.

Work Orders 93-11751-61, 93-11751-66, 93-11751-21, 93-11751-19, and 93-13527-00 were closed without completing the required splice replacements based on a determination that the planned work was not within the intent of Design Change Notice Q-17111-A. However, the splice terminations were identified in the design change notice for replacement and the work order did not receive the same level of technical review and approval as Design Change Notice Q-17111-A. The splices are associated with the following temperature elements.

<u>Work Order</u>	<u>Temperature Element</u>
93-11751-61	1-TE-068-0001-D
93-11751-66	1-TE-068-0018-D
93-11751-21	1-TE-068-0043-E
93-11751-19	1-TE-068-0065-E
93-13527-00	1-TE-074-0014-G"

TVA REPLY TO EXAMPLE 1

TVA agrees that the violation example occurred.

REASON FOR THE VIOLATION

This violation example resulted from personnel error due to failure to follow the requirements of procedures.

Nuclear Engineering Procedure, (NEP)-5.1, "Design Output," Revision 3, defines design output documents as those documents which implement design criteria; which are based upon approved and issued design input; and which specify the technical requirements of structures, systems, and components. They are prepared by or for engineering for purchase, construction, installation, testing, maintenance, modification, and operation of structures, systems, and components.

Section 3.1 of NEP-5.1 provides a list of design output documents. Work implementing documents (WIDs) are not listed in this NEP or Appendix A of WBN SSP-9.05, "Design Engineering Practice," Revision 0. Also, as stated in the violation above, Step 2.2.A.4 of SSP-9.03, "Plant Modification and Design Control," Revision 8, requires that changes during implementation of a design change notice require the same level of technical review and approval as the original notice.

Since the design engineer was also responsible for the splice issue of the Cable Issues Corrective Action Program (CAP) Plan, his intention was to disposition the splices in the WIDs, and then, initiate and gain approval for the design document changes prior to final closure of the splice issue. By dispositioning the WIDs first, and subsequently initiating a change to the design documents, he stated that this would allow field work to proceed. However, his actions were contrary to the procedures described above.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

TVA has performed an additional evaluation for acceptability of the five splices. As part of this evaluation, a test of their configuration was performed. Based on the test results, TVA has determined that these splices are acceptable "as is."

As a result of the evaluation above, TVA has revised calculation WBPEVAR8904055 to document the acceptance of these five splices. In addition, Design Change Notice (DCN) Q-37338-A was issued to delete the rework requirements for these five splices.

As a result of an extent of condition review, TVA concluded that this condition was limited to ten splices. Excluding the five splices discussed above, the remaining five splices had been subsequently reworked due to other reasons prior to the identification of this condition as noted in the inspection report.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

As recurrence control, the engineer involved in the work order disposition has been counselled to not waive requirements of design output documents. A memorandum has also been issued to engineering personnel to discuss the cause of this condition and to emphasize that the requirements of design output documents cannot be waived by technical justification in work implementing documents.

In addition, a copy of the corrective action document for this condition was used in the preparation of a lessons learned feedback concerning the performance of field work per the latest approved design output document prior to work implementing document closure.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to Example 1, TVA is in full compliance.

EXAMPLE 2

"Site Standard Practice SSP-3.06, Problem Evaluation Reports, Revision 16, Section 2.2.D, requires that the initiating supervisor of a problem evaluation report determine if the report is potentially reportable in accordance with Site Standard Practice SSP-4.05, NRC Reporting Requirements. Question II on Appendix E-1 of Site Standard

Practice SSP-4.05, 10 CFR 50.55(e) Screening Form Guidelines for Potential Reportability Determination, requires that the deficiency being evaluated be identified as potentially reportable and be forwarded to site licensing for further evaluation if the evaluator cannot confirm that, if left uncorrected, the affected safety system or component could have performed its required safety function, without reliance on future tests or operator actions.

On March 29, 1995, Site Standard Practices SSP-3.06 and SSP-4.05 were not followed when Problem Evaluation Report WBP950192 was determined to be not potentially reportable even though operator actions were required to remove a plug from the reference leg of level transmitter 1-LT-63-181 and subsequent retesting was required to confirm component operability.

On March 30, 1995, Site Standard Practices SSP-3.06 and SSP-4.05 were not followed when Problem Evaluation Report WBP950193 was determined to not be potentially reportable even though operator actions were required to reconfigure terminations for incorrectly wired temperature switch 1-TS-30-183 and subsequent retesting was required to confirm component operability."

TVA REPLY TO EXAMPLE 2

TVA agrees that the violation example occurred.

REASON FOR THE VIOLATION

The reason for incorrectly completing the Appendix E-1 form was personnel error. The involved supervisors either misread or misunderstood Question II in Appendix E-1 of SSP-4.05. One supervisor thought that answering Question II "Yes" meant that the deficiency was potentially reportable. The other supervisor was intimately familiar with the details of the PER and evaluated the deficiency to a level beyond that required by Question II.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Potential reportability determination screening forms for Problem Evaluation Reports (PERs) initiated within the last six months were reviewed. A total of eight incorrectly prepared screening forms (this number includes the two cases identified by NRC) were identified.

The Appendix E-1s for each of the eight PERs have been revised to reflect their condition as being "potentially reportable."

Site Licensing has completed a reportability determination for each of the eight PERs. None were determined to be reportable under 10 CFR 50.55(e).

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

Supervisors responsible for the incorrect potential reportability determinations have been coached on correctly completing SSP-4.05, Appendix E-1.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to Example 2, TVA is in full compliance.