

OCT 18 1993

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Docket Nos. 50-390, 50-391
License Nos. CPPR-91, CPPR-92

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford
Vice President, Technical Support
3B Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-390/93-45 AND 50-391/93-45

We have evaluated your response of August 19, 1993, to our Notice of Violation issued on July 20, 1993, concerning activities conducted at your Watts Bar facility. We have also held additional discussions with your staff regarding your basis for disputing the subject violation. Based on these discussions, field re-inspection of the subject hardware, and further review of the NOV, we have determined that the violation remains valid, in that the configuration of the subject supports and the design documents, including as-built information, do not agree. We do agree that the specific corrective action for the subject hardware, as described in your response, is satisfactory. We also recognize that the safety significance of the items cited in the violation may not be highly significant; however, we are concerned that data taken from the Hangar Analysis and Update Program (HAAUP) Corrective Action Program walkdowns are not accurately depicted on design output documents.

During discussion with your staff on this violation, we now understand that additional findings, similar in nature to those cited in the violation from the subject inspection report, were identified during a recently-concluded Additional Systematic Records Review (ASRR) audit. This audit, documented in WBP930196, identified numerous discrepancies between as-built drawings and installed supports.

In light of this, we are also concerned about your ability to meet the requirement in your Quality Assurance Program, that as-built drawings accurately reflect the configuration of as-built supports. The TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Revision 3, under 7.0, Design Control, paragraph 7.2.7 F, states the following: "Measures to control plant configuration and ensure that the actual plant configuration is accurately depicted on drawings and other appropriate design output documents and reconciled with the applicable design basis shall be established, documented and implemented."

The drawing deficiencies identified by both your staff and the NRC represent a significant deviation from the expected outcome of a carefully executed and reviewed program, the HAAUP CAP. While hardware modifications may not have

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OCT 18 1993

Tennessee Valley Authority

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been required as a result of these drawing deficiencies, you are required to maintain accurate drawings and design output documents that accurately represent the configuration of installed hardware in the plant.

Please provide an additional response to the Notice of Violation describing your corrective action to prevent recurrence, specifically as it pertains to your position on the extent-of-condition for this problem, the need to conduct further walkdowns to verify hardware adequacy and the need to ensure the accuracy of your as-built drawings. In this response you should discuss the status of the ASRR pipe support inspection findings, the generic aspects of these findings, the significance of the findings, and actions taken to correct these discrepancies, such as re-performing calculations and accomplishing drawing changes. The information in the response should include adequacy of the hardware, adequacy of the as-built drawings, and whether these findings comply with the Records CAP, HAAUP CAP and your approved Quality Assurance Program.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, Pub. L. 96-511.

We appreciate your cooperation in this matter.

Sincerely,

(Original signed by E. Merschhoff)

Ellis W. Merschhoff, Director
Division of Reactor Projects

OCT 18 1993

Tennessee Valley Authority

3

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OCT 18 1993

Tennessee Valley Authority

4

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 Some grammatical
 changes could make this better