

DEC 17 1993

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

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford
Vice President, Technical
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Gentlemen:

SUBJECT: NRC INSPECTION REPORTS 50-390, 391/93-43, 93-53, 93-58, 93-61, 93-71

Thank you for your response of November 16, 1993, to our Notices of Violations and Deviation issued on July 23, 1993, August 27, 1993, and October 4, 1993, concerning activities conducted at your Watts Bar facility. We have evaluated your response and found that additional information and clarification is required in order to determine the adequacy of your response. Enclosure 1 of your response provided a general but comprehensive description of improvements in the Startup and Test Program that are being planned and implemented. If developed and implemented as stated, these improvements should provide the fundamental foundation for conducting a quality Startup and Test Program. However, we are concerned with the quality and content of the detailed responses to specific violations contained in the Enclosures of your response. Many of these detailed responses are unclear and incomplete and appear to focus primarily on describing mitigating circumstances rather than addressing the root causes. As a result, it is difficult to assess the effectiveness of your corrective actions.

The details of our concerns have been discussed with your staff at Watts Bar. The enclosure to this letter summarizes the issues that need further clarification. Please provide a supplemental response that addresses each of these issues and clearly details TVA's position and corrective actions for each of the cited violations within 30 days of the date of this letter.

We appreciate your cooperation in this matter.

Sincerely,

Original signed by
Johns P. Jaudon/for

Albert F. Gibson, Director
Division of Reactor Safety

030001

Enclosure:
Request for Clarification of Response

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PDR ADOCK 05000390
Q PDR

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Tennessee Valley Authority

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cc w/encl:

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Tennessee Valley Authority

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for
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for
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12/16/93*Per Phone call*

ENCLOSURE

Request for Clarification of TVA Response

A. Enclosure 1, Startup Program Improvements

- It is unclear what TVA plans are for implementing the individual corrective actions identified in Enclosure 1, and whether objective evidence will be provided to document the results achieved.
- Please clarify the discussion in the first paragraph on page E1-3. It is not clear that specific written guidelines and areas of responsibilities will be identified and implemented to describe the interface between Nuclear Engineering (NE) and the Startup Group fully with respect to de-activating the test scoping documents (TSDs). In addition, it is not clear what the effects of de-activating TSDs will have on other TVA regulatory commitments and processes such as the SPAE process, completed preoperational tests, existing DCNs, DCAs, etc.
- Please clarify the second paragraph of page E1-3. Does TVA intend to revise their preoperational testing commitments contained in FSAR Chapter 14? If so, when will this be completed and submitted to NRC for review?
- Please state the dates that corrective actions of Enclosure 1 will be completed and results achieved.

B. Enclosure 2, Reply to NRC letters of August 27, 1993 and September 29, 1993 Violation 50-390/93-53-02 and 50-390/93-61-01

- Page E2-5, Violation 50-390/93-61-01

It is unclear in TVA's response whether the violation is being contested and what TVA's plans are for ensuring that acceptance criteria is provide in preoperational test instructions in the future. Please clarify.

- Please clarify paragraph two on page E2-7. TVA states that TSDs will not be maintained and design information will be placed in "appropriate design documents". This should be an organized proceduralized process by TVA.

C. Enclosure 4, TVA Response to NRC Violation 50-390/93-58-01, Example 3-6

- For example 3, the response does not clearly provide either the reason for the violation or the basis for dispute. Please clarify.
- Example 3 of the violation describes SMP 9.0 as being deficient with respect to rework inspection. The response appears to describe SMP 6.0 (not SMP 9.0) as providing guidance on rework

inspection. Please clarify the relationship of SMP 6.0 to SMP 9.0.

- The response for examples 3 and 4 appears to explain that rework inspection and test activities are, in fact, being done. Please address the following questions to clarify the extent of this effort:
 - Is every case of rework performed by SUT verified and documented as meeting the original inspection and test requirements and does the documentation of this verification meet ANSI N45.4-1974?
 - Is the minimum bend radius criteria cited in the response contained in all pertinent SUT procedures, and, for Class 1E cables, is it in conformance with the requirements of WBN Specification G-38, Installation, Modification, and Maintenance of Insulated Cables Rated Up to 15,000 Volts?
 - Are the verification signatures for bend radius, tightness, and damage and that restoration is complete, cited as contained in procedure GTEXXX-02, completed by the individual doing the verification and does one signature apply to more than one configuration change?
- For examples 3 and 4, the discussion in the first full paragraph on page E4-3 appears to provide justification for non-adherence to specific procedural requirements based on a conclusion that the general intent of the procedural requirements were met by alternate means. Please clarify the intent of this paragraph.
- For examples 3 and 4, the discussion in the second full paragraph on page E4-3 appears to indicate that the existing program inspections and configuration control requirements were redundant and that final testing after rework assures proper installation. Please clarify the intent of this paragraph as it pertains to the violation example.
- For examples 5 and 6, the response paragraph is titled "REASON FOR VIOLATION", but the text appears to dispute the violation. The text does not clearly provide either the reason for the violation or the basis for dispute. Please clarify.
- The response to Example 5 does not indicate where the counselling of the responsible individual and the involvement of the JTG Chairman and senior SUT management in resolution of the DNs were documented. In addition, it is not clear whether a determination was made and documented that this was strictly an isolated case of personnel error and that there were no programmatic or procedural weaknesses involved. Please clarify.
- The response to example 6 is not clear on whether these test deficiencies are considered "adverse" or not. In addition, the

response is not clear as to why the verification that a vendor manual change request was issued, is not considered a part of tracking an action to closure. Please clarify.

D. Enclosure 6, List of Commitments

- The schedule for completing the list of commitments is unclear.
- Enclosure 2, items 3 and 4, should be clarified to clearly state that the issues dealing with valve-logic testing, instrumentation accuracy, and methods for setting flowrate will be incorporate into the test program.