



Tennessee Valley Authority Post Office Box 2000, Spring City, Tennessee 37381

William J. Museler
Site Vice President
Watts Bar Nuclear Plant

DEC 28 1993

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NO. 390, 391/93-73 -
REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to respond to Inspection Report 390, 391/93-73
dated December 3, 1993, which identified a violation relating to following
procedures for correcting drawing discrepancies.

The enclosure provides TVA's response to the Notice of Violation.

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

Very truly yours,

William J. Museler

Enclosure

cc: See page 2

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cc (Enclosure):

NRC Resident Inspector
Watts Bar Nuclear Plant
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U.S. Nuclear Regulatory Commission
Region II
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ENCLOSURE
WATTS BAR NUCLEAR PLANT
REPLY TO NRC'S DECEMBER 5, 1993 LETTER TO TVA
VIOLATIONS 390, 391/93-73-01

Violation A, 50-390, 391/93-73-01:

Criterion V of Appendix B to 10 CFR 50 and the licensee's accepted Quality Assurance Program, TVA-NQA-PLN 89-A, "Nuclear Quality Assurance Plan," Revision 3, Section 6.1.2A1 require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with those instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Engineering Administrative Instruction (EAI) 3.09, "Incorporation of Change Documents into Drawings," Revision 9, establishes requirements for incorporating change documents into affected drawings by developing an initial issue of a drawing or revising an existing drawing. Section 2.1 defines an Administrative Revision as a revision to a drawing to correct, add, or delete non-technical information or to improve drawing legibility. Additionally, Section 4.1.5.D requires that all requests for Administrative Revisions shall be evaluated against Site Standard Practice (SSP)-2.11, "Drawing Deviation Program." Requests that fall within the scope of a Drawing Deviation, as defined by SSP-2.11, must be processed as a Drawing Deviation and not an Administrative Revision.

Procedure SSP-2.11 controls evaluating, dispositioning, and documenting apparent discrepancies between Plant Configuration and as-constructed (AC) or configuration control drawings (CCDs) at Watts Bar Nuclear Plant. Section 2.0 requires that all reported drawing discrepancies be considered potential Drawing Deviations (DDs) until validated per subsection 2.2.B.4.

Contrary to the above, drawing discrepancies identified during reviews of electrical schematics and annunciator drawings performed in compliance with licensee commitments NCO 930030001 and NCO 930030002 respectively, were not validated per SSP-2.11, Subsection 2.2.B.4 and were not evaluated for disposition as Drawing Deviations. The following "S" design change notices (DCNs) were approved on the dates shown to correct identified drawing discrepancies as Administrative Revisions to the affected drawings listed on Appendix O, DCN Package Index, DCA/Drawings issued with the package. (The DCNs and Approval Dates are listed in the Notice of Violation).

TVA Response to Violation A, 50-390, 391/93-73-01:

TVA concurs with the violation.

Reason For Violation

WBN has determined that this violation occurred due to vague and incomplete guidance in SSP-2.11 concerning the definition of "minor in nature." The

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WATTS BAR NUCLEAR PLANT
REPLY TO NRC'S DECEMBER 5, 1993 LETTER TO TVA
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process for invalidation of DDs contributed to inappropriate decisions being made for the program implementation.

Personnel responsible for the administration of the schematic/annunciator drawing review program misinterpreted the definition of 'minor in nature' when considering the threshold of an adverse condition. In addition, SSP-2.11 did not directly address the situation where two AC/CCD drawings exist which contain the same information and the first drawing is used to construct the plant but the second is not (e.g., connection drawings vs schematic drawings). Personnel involved in this event made an incorrect interpretation from SSP-2.11 that a DD was not required for this situation.

This incident was judged to be isolated to the schematic and annunciator drawing review program.

Corrective Steps Taken And Results Achieved

An Incident Investigation (II) team was assembled by TVA management on October 26, 1993. The II team considered the differences between the attributes of the DD program and the direct disposition of the changes as S-DCNs and concluded that the generation of DDs retroactively for the discrepancies would provide no benefit to the drawing change process. If DDs had been prepared, the discrepancies and required changes would have been ultimately dispositioned as S-DCNs. The incident investigation is documented in report II-W-93-023, dated November 24, 1993.

Corrective Steps Taken To Avoid Further Violations

In order to prevent further potential procedural violations, TVA issued a verbal order on October 22, 1993, to the engineering contractor to begin documenting valid drawing discrepancies in the DD program. Written instructions were then provided to the engineering contractor on November 4, 1993, to specifically require that DDs be initiated in accordance with SSP-2.11, if required, when drawing discrepancies are found in the schematic/annunciator drawing review program.

SSP-2.11 has been revised to add examples of DDs related to NE activities, and provide guidance for processing DDs for drawing problems which are corrected with S-DCNs prior to the validation of the DDs.

Training in recognizing conditions that represent valid DDs has been provided to NE and contractor engineering personnel.

The Engineering Manager issued a memorandum on December 15, 1993, to NE and contractor engineering managers that stresses the importance of self-checking for themselves and their employees when involved in tasks covering a duration of several weeks by revisiting earlier decisions and confirming their validity.

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Date When Full Compliance Will Be Achieved

Corrective actions were completed on December 15, 1993, and TVA is now in full compliance with the identified requirements related to this NOV.

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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: NOTICE OF VIOLATION
(NRC INSPECTION REPORT NOS. 50-390/93-73 AND 50-391/93-73)

This refers to the inspection conducted by C. Smith of this office on October 18-22, and November 1-5, 1993. The inspection included a review of activities authorized for your Watts Bar facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation is of concern because it is indicative of inadequacies in the implementation of NRC commitments by Nuclear Engineering Management.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

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Tennessee Valley Authority

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The response directed by this letter and the enclosed Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,

Original signed by Albert F. Gibson

Albert F. Gibson, Director
Division of Reactor Safety

Enclosures:

1. NRC Inspection Report
2. Notice of Violation

cc w/encls:

Craven Crowell, Chairman
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(cc w/encls cont'd - See page 3)

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(cc w/encls cont'd)
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Honorable Garland Lanksford
County Executive
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(cc w/encls cont'd - See page 4)

Tennessee Valley Authority

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(cc w/encls cont'd)
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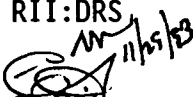
bcc w/encls:

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J. R. Johnson, DRP/RII
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RII:DRS


CSmith
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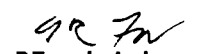
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PTaylor
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CJulian
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