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JAN 13 1994

U.S. Nuclear Regulatory Commission
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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 50-390, 391/93-75 -
RESPONSE TO CONCERN

The purpose of this letter is to provide the written response required by NRC Inspection Report 50-390, 391/93-75. In the cover letter to the subject inspection report, NRC identified a concern regarding the permanent nature of corrective actions at Watts Bar. The inspection found two cases (an additional example was identified in NRC Inspection Report 50-390, 391/93-83) where Employee Concern Special Program (ECSP) corrective actions were apparently negated without consideration of the previous corrective actions put in place. NRC is concerned that the control of procedure changes does not adequately consider previous corrective actions implemented by the procedure or its predecessor procedures.

Enclosure 1 provides TVA's response to the NRC concern. Enclosure 2 contains a list of commitments made in this submittal.

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

Very truly yours,

William J. Museler

Enclosures

cc: See page 2

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ENCLOSURE 1

NRC INSPECTION REPORT 50-390, 391/93-75

NRC CONCERN

The subject inspection report identified a concern regarding the permanent nature of corrective actions at Watts Bar. The inspection found two cases (an additional example was documented in NRC Inspection Report 50-390, 391/93-83) where Employee Concern Special Program (ECSP) corrective actions were negated without consideration of the previous corrective actions put in place. NRC is concerned that the control of procedure changes does not adequately consider previous corrective actions implemented by the procedure or its predecessor procedures.

TVA is required to provide a response that describes what assurance WBN has that other corrective actions developed within the ECSP have not been negated by subsequent changes. NRC also requests that WBN evaluate the generic applicability of this problem to other site corrective action processes.

TVA (WBN) RESPONSE

WBN relies on procedure "source notes" to remind procedure sponsors of previous corrective actions being implemented by their procedure prior to making changes. When source noting was initially implemented by WBN site procedures, backfitting to previous corrective actions was not required, except for the area of NRC commitments. WBN's review of the source noting process is as follows.

ECSP Corrective Actions

As stated in the subject inspection reports, the implementation of some CATD corrective actions may have been changed since closure of the CATD.

As stated in a letter to NRC dated August 20, 1993, TVA has initiated a Lookback Project which reviews corrective actions taken to address ECSP employee concerns. Within the scope of the Lookback Project, closed corrective actions are being reviewed to determine whether they are still being adequately implemented and open corrective actions are being reviewed by the Lookback Project during the closure process. Both reviews provide assurance that adequate source noting has been accomplished and that corrective actions have not been negated.

Other Corrective Action Processes

TVA has confidence that previous programmatic NRC commitments are being adequately source noted through implementation of the Program for Assurance of Completion and Assurance of Quality (PAC/AQ), which is an integral part of the Design Baseline and Verification Program (DBVP) Corrective Action Program (CAP). However, in order to evaluate the generic applicability of source noting to other corrective action processes, WBN will conduct an assessment of the implementation of the source noting requirements contained in SSP-2.03, "Administration of Site Procedures," and SSP-2.04, "Source Requirements Identification and Tracking," (excluding CATDs and NRC commitments addressed by PAC/AQ). The assessment will be led by Nuclear Assurance, with assistance from owners of the affected

corrective action processes. This assessment will be completed by March 31, 1994. Any adverse conditions will be documented in accordance with the WBN Corrective Action Program, as necessary.

Specific CATD Examples

The following CATDs were identified by NRC as having corrective actions changed after closure of the CATD. In each case, WBN reopened the CATD to address the NRC concerns.

IR 50-390, 391/93-75

19200-NPS-05, Generic Reviews of Corrective Actions and NRC-Reported Issues.

30704-WBN-04, Generic Applicability Reviews for Workplan Nonconformances.

IR 50-390, 391/93-83

10900-NPS-02, Use of Improper Tools to Breach Fire Barriers.

ENCLOSURE 2

LIST OF COMMITMENTS

WBN will conduct an assessment of the implementation of source noting requirements contained in SSP-2.03 and SSP-2.04 (excluding CATDs and NRC commitments addressed by PAC/AQ). The assessment will be led by Nuclear Assurance, with assistance from owners of the affected corrective action processes. This assessment will be completed by March 31, 1994. Any adverse conditions will be documented in accordance with the WBN Corrective Action Program, as necessary.