

U.S. Nuclear Regulatory Commission
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cc (Enclosure):

NRC Resident Inspector
Watts Bar Nuclear Plant
Rt. 2, Box 700
Spring City, Tennessee 37381

Mr. P. S. Tam, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1
RESPONSE TO NRC'S JANUARY 14, 1994 LETTER TO TVA
NRC VIOLATION 390/93-85-01

DESCRIPTION OF VIOLATION 390/93-85-01

10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, as implemented by TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89A (Revision 3), Section 6.1, requires 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 these instructions, procedures, or drawings.

Modification Addition Instruction MAI-4.7A, "Hydro Testing of Pipe," Revision 8, paragraph 6.8.3 states that Operations or designee shall return the system to normal configuration specified by the shift operations supervisor. Paragraph 6.8.4 states that the responsible engineer/test director is to confirm that the post-test valve line-up has been performed to restore the system to normal or to the position specified by the shift operations supervisor.

Contrary to the above, activities affecting quality were not accomplished in accordance with approved procedures in that on August 6, 1993, procedure MAI-4.7A was not adhered to when post-test valve line-ups to restore the system to normal were not confirmed by the responsible engineer/test director following a hydrostatic test of the chemical and volume control system discharge header conducted under Work Order 93-05688-00. This resulted in the failure to restore the system to normal or to the position specified by the shift operations supervisor.

TVA RESPONSE

TVA concurs with the violation

REASON FOR VIOLATION

This violation occurred because personnel failed to adhere to the procedure requirement for obtaining operations verification of the post-test valve line-up in accordance with MAI-4.7A. Personnel performing hydrostatic testing mistakenly determined that the post-test valve line-up section of Appendix A (Test Line-up Form) was not applicable. Their determination was based upon the fact that (1) the system had not been officially transferred to operations, (2) an understanding that a post-test valve line-up would be completed by plant operations support personnel at a later date as a part of pre-operational testing and (3) knowing that Operations is responsible for issuance of the Hold Orders for controlling process pipe valve positions.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The circumstances of this violation have been discussed with the involved personnel to emphasize the need to comply with the procedure stated.

In order to prevent future misunderstanding of this procedure, MAI-4.7A has been revised to clarify the responsibility for post-test valve line-up configuration. The procedure now requires Operations/Maintenance personnel to specify on the valve line-up form which program/procedure will reconfigure the system. If the system is still in a construction state Operations/Maintenance has an option to N/A reconfiguration. To ensure understanding and compliance with the revised procedure, personnel responsible for conducting the testing have been trained to MAI-4.7A, Revision 10.

System configuration concurrence was obtained at the time of Work Order closure by obtaining Operations signature on Appendix J of the Work Order, "Operations Acceptance for Work Order Closure." This signature indicated Operations concurrence with the closure of the Work Order including the post-test valve line-up. Because Hold Orders are issued to isolate the systems for testing and Operations concurred with closure no further specific corrective steps for extent of condition are considered necessary.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

Due to the occurrence of several deficiencies such as that identified in this violation, TVA has implemented a quality initiatives program at Watts Bar to re-emphasize the importance of getting the job done right the first time. Managers have conducted sessions with each organization to emphasize that individuals must take ownership for the quality of the plant. A clear message is being sent that everyone is responsible for providing attention to detail, only performing authorized work, using the correct materials, and ensuring an operational readiness attitude. Several recent deficiencies were also presented as examples that could have been corrected at the working level.

The message conveyed by this quality initiatives program re-emphasized the importance of following requirements including assuming ownership, having a questioning attitude, and understanding the work objectives. In addition, management re-committed to remaining involved in getting the job done right, identifying and addressing problems, and being receptive to any personnel concerns.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA is currently in full compliance.