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John H. Garrity
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MAR 10 1992

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT NUMBER
390, 391/33-01 - REPLY TO NOTICE OF VIOLATION

This letter responds to Inspection Report 390, 391/91-33 dated February 10, 1992, which identified one Severity Level IV violation involving a failure to comply with TVA housekeeping requirements. Enclosure 1 to this letter addresses the specific conditions described in the subject inspection report and the corrective actions taken by TVA. Enclosure 2 includes the commitments made in this report. In addition, this response revises a previous commitment made on this subject in TVA response to NRC violation 391/87-19-02 dated August 4, 1988.

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

Sincerely,

JH Garrity
John H. Garrity

Enclosures
cc: See Page 2

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U.S. Nuclear Regulatory Commission

MAR 10 1992

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO NRC'S FEBRUARY 10, 1992 LETTER TO TVA
NRC VIOLATION 390/91-33-01

DESCRIPTION OF VIOLATION 390/91-33-01

10 CFR Part 50, Appendix B, Criterion XIII, as implemented by the Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Revision 2, Paragraph 9.6.1, "Handling, Storage, and Shipping," requires that preservation of material and equipment be controlled in accordance with work and inspection instructions to prevent damage or deterioration.

Site Standard Practice (SSP)-12.07, Revision 0, "Housekeeping/Temporary Equipment Control," required that monthly inspections on transferred equipment be performed and documented with deficiencies noted by the Operations personnel on a monthly basis.

Contrary to the above, monthly inspections of the Unit 1 North and South Steam Valve Rooms were not performed as indicated by the documentation presented for the 12-month period during 1991.

REASON FOR THE VIOLATION

The subject violation occurred as the result of a failure by personnel to follow procedure requirements. Through interviews of the personnel responsible for conducting housekeeping inspections from April 1990 through September 1991 TVA determined that, for the most part, monthly housekeeping inspections were being performed. However, records documenting these inspections were found for only 67 percent of the inspections for this period. Interviews with individuals who failed to transmit the records to the Document Control Unit (DCU) indicated that some understood the requirement to perform monthly inspections, but were not aware of the procedure requirement to forward the records to DCU.

Contributing to this violation was TVA's failure to have a line organization monitoring program in place to ensure procedural compliance. The effectiveness and completion of the inspection program should have been periodically audited or evaluated to ensure inspections were being completed and sent to DCU as required by the procedure. The Quality Assurance (QA) organization performed monitoring of the plant for cleanliness, but were not checking to ensure that SSP-12.07 documentation requirements were being implemented. An additional contributing factor was a recent change in the organizations responsible for maintaining the housekeeping program. The lack of a clear transfer of responsibility for inspection when work activities were incomplete led to some confusion between organizations about those actually responsible for completing and documenting the monthly inspections. As a result, some inspections were not performed.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The specific housekeeping deficiencies in the plant that are identified in this inspection report have been corrected. In addition, an inspection of the plant has been completed in accordance with SSP-12.07. QA has verified that the completed records have been transmitted to DCU. Personnel who failed to transmit the necessary records to DCU, and in some instances failed to perform inspections, have been instructed on the importance of following and completing procedure requirements.

To maintain a high-level of housekeeping fitness, personnel are informed in General Employee Training that they are accountable for housekeeping quality. Employees are instructed to prevent housekeeping problems and ensure that any identified problem is promptly corrected. Craftmen are expected to leave their work areas as clean or cleaner than when an activity started. In addition, first line supervisors for work activities are trained to ensure that their work activities comply with the requirements of the housekeeping procedure. SSP 12.07 also requires that any condition needing correction is corrected before starting work and that areas are cleaned up before any activity is considered complete. The controlling work instructions for activities other than minor maintenance work contain steps to verify that work areas are returned to normal, including a final housekeeping signoff. Supervisory and/or management personnel routinely monitor ongoing activities and areas where activities are reported complete to ensure housekeeping quality is maintained.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

SSP-12.07 has been revised to clarify responsibility for the oversight of housekeeping in each area of the plant. This procedure now applies to WBN Units 1 and 2 and is the principal procedure in-place delineating housekeeping requirements. Overall responsibility for the procedure now belongs to the Plant organization. To verify compliance to the procedure, the Plant organization will review the housekeeping records for the next six months to ensure they are complete and properly turned over to DCU. At the end of six months, the Plant will assess the program and readjust the record review frequency.

The responsibility for the oversight of housekeeping activities in construction areas has been assigned to the Modifications organization. When construction activities are completed in an assigned area, that area will be transferred from the Modifications organization to the Plant organization, and the responsibility for the oversight of housekeeping in that area will be reassigned. To eliminate any confusion about who has responsibility, the transfer is made by obtaining a concurrence signature from the existing owner and an approval signature from the new owner. The manager responsible for performing the monthly inspection is then entered in TVA's Employee Training System data base. This data base helps ensure that proper training is provided to address any future changes to SSP-12.07.

In the course of the housekeeping records review to ensure that the necessary inspection documentation was transmitted to DCU, QA identified that the date and actions taken to resolve deficiencies were not always required to be listed on the housekeeping inspection document when the deficiency was immediately corrected. TVA is in the process of revising SSP-12.07 to the corrective actions taken and verification for completed actions be included in the documentation. TVA's will ensure that the deficiencies identified in January have been corrected or reidentified.

In addition, TVA committed in response to NRC Violation 391/87-19-02, dated August 4, 1988, to require quarterly housekeeping surveillances by the QA group of the entire plant independent of the line organizations. This commitment is being revised to be consistent with the corrective actions necessary to address the present violation and to reflect WBN's policy that the responsibility for quality belongs primarily to the line organization. Accordingly, rather than continuing its present practice of conducting housekeeping inspections independent of the line organizations, the QA group will monitor the line organizations to ensure that they are completing their housekeeping inspections in a timely and effective manner. The QA group will gradually transition to this practice by continuing to perform quarterly monitoring of the plant for the next two quarters, independent of the line organizations monthly inspections.¹ In addition, they will also monitor the line organizations implementation of SSP-12.07 by reviewing completed records of inspections. At the end of this transition period, QA will reevaluate the effectiveness of the housekeeping program. If QA is confident that the program is working well, they will cease performing separate monitoring of the plant, but will continue quarterly monitoring of the line organizations implementation of SSP-12.07.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA is currently in full compliance.

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1. For housekeeping monitoring purposes, TVA has identified the following areas upon which it will focus its attention:

Reactor Building Unit 1 (RB1)
Auxiliary Building (AB)
Turbine Building (TB)
CCW Pumping Station (CCW PS)
Diesel Generator Bldg (DGB)

Reactor Building Unit 2 (RB2)
Control Building (CB)
Additional Equipment Building (AEB)
Intake Pumping Station (IPS)
Additional Diesel Generator Bldg (ADGB)

ENCLOSURE 2

LIST OF COMMITMENTS

1. To verify compliance to the procedure, the Plant organization will review the housekeeping records for the next six months to ensure they are complete and properly turned over to DCU. At the end of six months, the plant will assess the program and readjust the record review frequency.
2. TVA is in the process of revising SSP-12.07 to include the corrective actions taken and verification for completed actions.