

IFI 50-390, 391/93-77-02: INADEQUATE CONTROL OF ANNUNCIATOR LIFTED LEAD

Non-safety annunciator cable 1-2A-72-3244 had been lifted in panel 1-PNL-55-M21/6 and not re-landed as required by Work Plan procedures. Workplan KP04063A-1 required the cables lifted by MR A-609582 to be relanded. WBP930443 was initiated to investigate the closure of Workplan KP04063A-1 with work being incomplete. This item was identified as an inspector followup item to review TVA's resolution of WBP930443. (The subject cable provides annunciation for a containment spray valve that is not fully closed.)

TVA RESPONSE TO IFI 50-390, 391/93-77-02

The subject IFI concerns the failure to re-land a nonsafety-related annunciator cable as required by Work Plan procedures. The IFI was initiated because the condition reflected an instance of inadequate work controls for nonsafety-related equipment.

Problem Evaluation Report WBP930443 was initiated to address the nonsafety-related annunciator cable lifted lead. This PER is closed and retrieveable from RIMS under number T46 940214 861. The cause for the deficiency was determined to be personnel error in that the workplan writer overlooked cable 1A3244 during generation of workplan K-P04063A-1. Recurrence controls for the deficient condition were determined not to be required. The deficiency occurred under the "old" work control program in effect prior to the 1990 WBN Stop Work Order (WBN 90-01). The "new" work control program instituted upon restart of construction activities provides sufficient recurrence controls. Also as a result of the 1990 Stop Work Order, craft personnel were released and Significant Corrective Action Report (SCAR) WBN900602SCA was generated. Corrective actions for this SCAR included employee training sessions on "Total Quality" and "Employee Responsibilities." These sessions emphasized each employee's responsibilities for quality and the importance of procedural compliance.

Further, during the process of implementing the Additional Systematic Records Review (ASRR) task at WBN, 72 Class 1E cables and their associated terminations (approximately 250) were reinspected. The findings of this review concluded that the cable installations met the 95/95 criteria established by the ASRR. This review provides confidence that lifted leads associated with Class 1E cables have been adequately controlled.

Also, cable 1A3244 is associated with the Containment Spray System (System 72) which had not been turned over to Startup. Implementation of Startup Manual Procedure (SMP)-4.0, "Transfer of Jurisdiction," for System 72 would have the identified the lifted cable.

Finally during the extent of condition review for WBP930443, a number of nonsafety-related cables lifted by MR-609582 were found to have been terminated. However, documentation of this condition was not retrieveable under Workplan K-P04063A-1. WBP940127 has been initiated to address this issue. Sufficient records to ensure the adequacy of these installations would have been generated from a number of subsequent activities performed during testing and turnover of equipment and systems. These activities include system completion (MAI-1.9), transfer walkdowns (SMP-4.0), component testing (SMP-6.0), and preoperational testing (SMP-8.0).

IFI 50-390, 391/93-77-03: FOLLOWUP OF MINOR SEISMIC SUPPORT DISCREPANCY

Seismically qualified electrical panel 1-PNL-31-L572/-A in the Post Accident Sampling Room of the Auxiliary Building had been mounted with only three of four anchor bolts installed. This installation deviated from design, and the records did not demonstrate that the deviation had been evaluated and accepted as an approved design variance. This item is identified as an inspector followup item to be reviewed further as part of the NRC Equipment Seismic CAP inspection for Seismic Category I(L) items.

TVA RESPONSE TO IFI 50-390, 391/93-77-03

As part of the implementation of the QA Records CAP, Record Plans were developed to provide a means to indicate which construction/installation records were the primary records required for the licensing of WBN. Record Plans are a matrix of the critical construction/installation attributes for plant elements and the records which provide evidence of the qualification of the installed items. Record Plans identify technical attributes and cross-reference QA records or programs that produce QA records addressing the attributes, aiding in future records retrieval. The original construction/installation records and/or supplemental/alternate records provide the documented evidence that the design requirements have been met for the particular attributes.

The Record Plan specifically addressing panel 1-L-572 is Element 04 - Electrical Equipment. This Record Plan does not rely on the original construction record to qualify the installation/configuration attribute. The record which TVA is relying on for the verification of installation of Category 1(L) items is produced by the Integrated Interaction Program. This program has produced walkdown packages on a system/area basis. Panel 1-L-572 is located in area 11D (Post Accident Sampling Room) and was verified as acceptable and documented in calculation 50052-C3-1770.