



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

DEC 15 1994

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 NO. 390, 391/94-11,  
CLARIFICATION OF TVA RESPONSE TO NOTICE OF VIOLATION (EXAMPLE 1)

Reference 1: TVA Letter to NRC, "WBN - NRC Inspection Report No. 390,  
391/94-11, Reply to Notice of Violation," April 15, 1994

Reference 2: TVA Letter to NRC, "WBN - NRC Inspection Report 390,  
391/94-11, Revision to Previous Response to Notice of  
Violation (Example 1)," September 30, 1994.

In Reference 1, TVA responded to Notice of Violation 390, 391/94-11-01  
(Example 1) which concerned site procedures that were issued with invalid  
references. Reference 2 provided a revised reason for the violation  
noting that applicable procedural requirements [Site Standard Practice  
(SSP)-2.03, "Administration of Site Procedures"] were in fact correct and  
that the issue resulted from lack of attention to detail by involved  
personnel. However, Reference 2 should have also withdrawn or revised the  
associated commitment to provide training to procedure sponsors by  
June 30, 1994.

The objective of the corrective actions specified in TVA's original  
violation response (Reference 1) was to provide sufficient information to  
procedure sponsors (department managers responsible for the development  
and continued maintenance of WBN procedures) on the expectations for use  
of references during procedure changes and revisions. Although TVA  
initially believed that these expectations required clarification in  
SSP-2.03, this was later determined unnecessary. This objective had been

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set forth in two commitments which were satisfactorily implemented. The first commitment (implemented in April 1994) pertained to educating personnel involved with the specific violation example, and the second (also implemented in April 1994), involved communication of expectations for use of references to department managers. In addition, in July 1994, a letter was sent to WBN sponsors indicating improvement was needed and again emphasized the importance of using correct references.

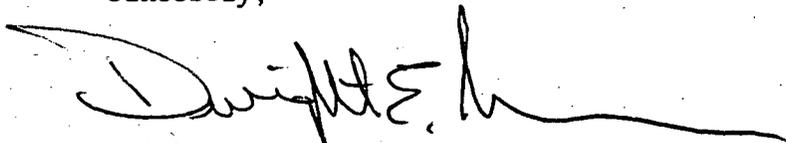
Although the formal training conducted on June 30, 1994, did not include representatives from all sponsoring organizations, TVA considers that expectations for use of references during procedure changes and revisions have been adequately communicated to WBN procedure sponsors. This has been attained through formal classroom training, personal notification, letters from site management to representatives of sponsoring organizations, and through established policy that site personnel must be aware and knowledgeable of procedure requirements prior to their use.

Performance in the area of "reference use" has been monitored since July 1994 with satisfactory results. During the period from August 1994 to December 1994, 12 procedures out of over 850 (less than 2% error) have been submitted to document control (DCRM) with reference errors. However, 8 of these errors resulted from duplication in several procedures which were essentially the same; i.e., if the mistake was made in one procedure it would be copied into each of the remaining procedures with little chance of identifying the mistake. In each case, the error was either corrected prior to procedure issuance or a change was made to correct the error immediately after issuance. In addition, the inadequate performance was discussed with the individuals responsible for the errors or their correction. In combination with general site efforts to reinforce procedure compliance, this monitoring process has heightened awareness with regard to use of references. Only one error has been identified since mid-October 1994. This error has been corrected.

In summary, TVA now considers that the overall violation (Example 1) has been resolved. The June 30, 1994, commitment given in Reference 1 is no longer considered necessary and is withdrawn. TVA is now in full compliance with respect to the violation example.

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

Sincerely,



Dwight E. Nunn  
Vice President  
New Plant Completion  
Watts Bar Nuclear Plant

cc: See page 3

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