

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

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 1
WATTS BAR NUCLEAR PLANT UNIT 1
SUPPLEMENTAL RESPONSE TO NRC INSPECTION REPORT 390,391/94-24

The following information addresses two NRC concerns pertaining to recurrence control and generic methods of preventing slope, separation, and support deficiencies identified in the cover letter of NRC Inspection Report 390, 391/94-24 and NRC letter dated September 2, 1994. Included in TVA's response to the first concern is supplemental information regarding TVA's reply to NRC violation 50-390/94-24-01 dated August 2, 1994.

DESCRIPTION OF CONCERN

"Recurrence controls for previously identified slope and separation deficiencies were not completely effective in preventing the recurrence of these conditions, and a number of deficiencies were identified pertaining to design and installation of instrument line supports."

TVA RESPONSE

Since NRC Inspection 390, 391/94-24, Watts Bar has performed Nuclear Assurance Assessment NA-WB-94-0134. This assessment resulted in the issuance of several corrective action documents. Additionally, due to the number of conditions identified, Significant Corrective Action Report (SCAR) WBSA950006 was initiated. This SCAR provides appropriate escalation for receiving management attention and evaluation of recurrence control for identified slope and separation deficiencies, as well as deficiencies identified in other areas of instrument line installations.

TVA's reply to NRC violation 50-390/94-24-01 dated August 2, 1994, described corrective steps taken or planned to avoid further violation. As a result of the above described Nuclear Assurance Assessment and SCAR WBSA950006, TVA is re-evaluating those steps to ensure that no additional steps are necessary to resolve identified slope and separation deficiencies. Any additional corrective steps required will be documented in SCAR WBSA950006. Any additional corrective steps required to resolve instrument line slope and separation deficiencies will be submitted to NRC as a revised or supplemental response, as appropriate.

DESCRIPTION OF CONCERN

"While the audits that were part of the Independent Verification Plan for the Instrument Lines CAP were effective in identifying numerous findings, these audits did not identify any adverse trends indicative of the numerous slope and support deficiencies cited in the ...inspection report. It is the NRC's expectation that problems of this nature be detected by your quality assurance organization in advance of major NRC inspections of corrective action program."

TVA RESPONSE

Nuclear Assurance has reviewed past performance in the assessment of corrective action programs and special programs (CAP/SPs) and determined that performance improvements were appropriate. As a result of a self-assessment and NRC concerns, an improvement plan was developed for the Nuclear Assurance Special Projects group. The improvement plan consisted of several items including a more focused approach to the verification of adequacy of hardware in the plant. In addition, resources were brought in from other TVA locations to assist in our improvement effort.

The improvement plan has already produced some positive results as demonstrated by NRC comments in Inspection Report 50-390, 391/94-53. The plan has also produced positive results in the form of hardware deficiencies being identified. This was noted in Item 4 of TVA's letter to NRC, dated February 21, 1995, relative to validation of the causes of eight construction issues. This item indicated that corrective action documents were initiated in each of the areas of Environmental Qualification, Instrument Line, and Electrical Issues, to which the line organizations are taking action to correct the deficiencies.

The following information addresses the NRC concern pertaining to the use of walkdowns that was identified in NRC letter dated September 2, 1994.

DESCRIPTION OF CONCERN

"Based on several findings during the last year by both TVA and the NRC, we are concerned over the use of walkdowns to ensure that all damaged sense lines are identified and corrected to meet design requirements."

TVA RESPONSE

The scope of the final walkdown discussed in TVA's reply to NRC violation 50-390/94-24-01 includes those sense lines originally included in the corrective action plan for NCR6172SCA and sense lines associated with safety-related instrument applications installed after the initial issuance of Specification N3E-934 (January 1987). The implementation of the final walkdown consists of five separate walkdown packages that visually re-inspects the sense line for damage. Slope measuring devices may be utilized for sense line segments that are installed at marginal slope values. The walkdown evaluation criteria is consistent with N3E-934, Sections 3.6 and 4.6. Sense lines segments that are considered particularly susceptible to damage will be closely evaluated for potential damage mechanisms such as lines located in congested or high traffic areas. Susceptible sense line segments are those that are particularly vulnerable to violation of minimum slope values due to damage. The following are examples of susceptible sense lines:

- flex hose installations,
- sense line segments installed in areas that are subject to normal plant modification activities and are installed at minimum slope values, and
- sense line segments that have experienced problems maintaining proper slope.

ENCLOSURE 2
WATTS BAR NUCLEAR PLANT UNIT 1
SUPPLEMENTAL RESPONSE TO NRC INSPECTION REPORT 390,391/94-24

COMMITMENT AS STATED IN TVA'S AUGUST 2, 1994 LETTER TO NRC

"A review of the trending of Drawing Deviations as defined in Site Standard Practice (SSP)-2.11, "Drawing Deviation Program," will be performed to determine if this type of error has occurred with a frequency that would indicate a significant problem."

DISCUSSION:

The above deficiency identified a drawing discrepancy associated with the electrical power symbols for instruments (0-LT-77-134, and -135) shown on drawing 47W600-144. The approach of selecting a population of this type of problem in detail could not be done using the tools available in SSP-2.11. Instead, to evaluate the extent of condition, a total review approach was taken. The appropriate 47W600-series drawings were reviewed to identify their associated drawing deviations. This review concluded that no other drawing discrepancies were found that were similar to the deficiency identified in Drawing Deviation (DD) 94-0234.

ENCLOSURE 3
WATTS BAR NUCLEAR PLANT UNIT 1
SUPPLEMENTAL RESPONSE TO NRC INSPECTION REPORT 390,391/94-24

The following new commitment is contained in this letter regarding NRC Violation 50-390/94-24-01.

1. Any additional corrective steps required to resolve instrument line slope and separation deficiencies [with respect to SCAR WBSCA950006] will be submitted to NRC as a revised or supplemental response, as appropriate.