



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

AUG 26 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) - UNITS 1 AND 2 - NRC INSPECTION REPORT NO.
50-390, 391/94-48, REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of Violation 50-390, 391/94-48-01 cited in the subject inspection report dated July 27, 1994. The violation is associated with TVA's corrective actions to maintain traceability of measuring and test equipment to work performed and to resolve the backlog of out-of-tolerance evaluations. Enclosure 1 to this letter addresses the violation as described in the inspection report and the corrective actions taken by TVA. Enclosure 2 lists the commitment made by this letter.

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

Enclosures
cc: See page 2

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cc (Enclosures):

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ENCLOSURE 1
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO NRC'S JULY 27, 1994, LETTER TO TVA
NRC VIOLATION 50-390, 391/94-48-01

DESCRIPTION OF VIOLATION 50-390, 391/94-48-01

"10 CFR 50, Appendix B, Criteria XVI, requires that measures shall be established to assure that conditions adverse to quality such as nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

TVA-NQA-PLN89-A, Nuclear Quality Assurance Plan, Revision 3, Section 10.0, Adverse Conditions, Paragraph 10.2.2, Corrective Action For Adverse Condition, Step 10.2.2.E requires that the cause of significant adverse conditions shall be determined and corrective action taken to preclude recurrence.

Site Standard Practice SSP-3.04, Corrective Action Program, Revision 12, Section 2.4.G, requires that specific actions to correct adverse conditions and prevent recurrence be developed.

Site Standard Practice SSP-3.06, Problem Evaluation Reports, Revision 11, Section 2.4.F, requires that specific actions to correct adverse conditions and prevent recurrence be developed.

Contrary to the above, as of July 2, 1994, although numerous corrective action documents have been issued identifying various problems with the Measuring and Test Equipment program, the corrective actions developed to prevent recurrence of procedure violations of Site Standard Practice SSP-6.07, Control of Measuring and Test Equipment, Revision 7, have been inadequate. This is evidenced by examples of failure to maintain traceability of measuring and test equipment to work performed and the continued backlog of overdue, out-of-tolerance evaluations."

TVA RESPONSE

TVA concurs with the violation.

REASON FOR THE VIOLATION

The portion of the subject violation identifying examples of failure to maintain traceability of measuring and test equipment (M&TE) to work performed occurred due to a failure by personnel to follow the procedural requirements of SSP-6.07, "Control of Measuring and Test Equipment," for reporting usage to the tool room attendant. At the time of M&TE issue, an "Issue Ticket" is provided to the user for the specific work document presented. It is the users responsibility to record the M&TE use in the work document and report any additional usages to the tool room attendant. Additional usage work documents are recorded by the attendant and "Issue Ticket(s)" are provided to the user for insertion into these work documents. M&TE use was being

documented in the applicable work document, but in some cases the user failed to report these additional uses to the tool room attendant. In addition, personnel performing work document closure reviews failed to note the absence of a M&TE "Issue Ticket."

The concern with the backlog of overdue, out-of-tolerance evaluations occurred as a result of the extremely large number of instruments issued since the beginning of 1994 to support plant completion and startup activities, combined with an effort to reduce late M&TE returns. M&TE has been issued at the average rate of 12,000 issues per month. During the period of April through June, 1571 pieces of WBN M&TE were calibrated with 206 pieces being found out of tolerance. During the same period, an effort to reduce the number of late M&TE returns also resulted in a higher number of reports of lost M&TE than usual. Each lost piece requires an out-of-tolerance evaluation be completed.

Each out-of-tolerance report can result in the generation of up to five nonconformance evaluation packages since a separate package is sent to each organization that used the subject piece since the last calibration. Also contributing to this backlog was an effort to raise the level of expectations from the responsible organizations completing the evaluations.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

In the fall of 1993, a new computer program was designed and implemented to increase the reliability and accuracy of the M&TE usage log. Work implementing documents were barcoded to expedite the issuance of M&TE and to help eliminate human error entries. This program also resulted in an "Issue Ticket" being generated for insertion into each work implementing document. The purpose of the "Issue Ticket," in addition to providing important information to the user, was to provide a barrier against unreported use. The work document procedures were revised to require personnel responsible for the work document closure review to verify M&TE used against the M&TE "Issue Ticket." While these measures have resulted in improvements in the program, some problems remained. As a result, SSP-6.07 has been revised to state that M&TE can only be used for the work document referenced on the "Issue Ticket." Additional uses are no longer permitted without first reporting the intended use of the M&TE to the M&TE tool room attendant. Exceptions to this will be by prior arrangement only.

As part of the corrective action associated with problem evaluation report (PER) WBP940332, initiated to address M&TE deviations, TVA sampled implementing work documents for unreported M&TE usage. M&TE found recorded in work documents, but not listed in the M&TE usage log, were entered into the data base. M&TE identified as not previously listed in the usage log was evaluated for field impact. None of the examples identified would have adversely impacted the field installation. In addition, the M&TE manager issued a memorandum to M&TE users, their supervisors, and work document reviewers, informing them of the continuing problems in this area and reemphasizing the requirements of the program.

Training has been conducted to ensure that the work document reviewers are familiar with the requirements of SSP-6.07. The training described the subject violation and emphasized the importance of ensuring the M&TE "Issue Ticket" is included in the work document.

TVA has also increased management attention to reduce the backlog of overdue, out-of-tolerance evaluations. The number of out-of-tolerance evaluations that had not been completed for more than 30 days, was reduced from 156 on June 19, 1994, to a current backlog of zero.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATION

In addition to the routine assessments being completed by QA, self-assessments will be conducted by the M&TE Group monthly, for the next four months, or until greater confidence in the program is achieved.

Management attention to address out-of-tolerance evaluations has been increased through the use of performance indicators and management notification of specific items overdue. This management attention combined with the completion of startup related activities will result in an acceptable level of out-of-tolerance evaluations.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All corrective action steps associated to correct the identified M&TE deviations were completed by August 24, 1994. TVA is now in compliance with SSP-6.07.

ENCLOSURE 2

SUMMARY OF COMMITMENT

Self-assessments will be conducted by the M&TE Group monthly, for the next four months, or until greater confidence in the program is achieved.