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

SEP 27 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)

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - NRC INSPECTION REPORT NO. 50-390/94-55, REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of Violation 50-390/94-55-02 cited in the subject inspection report dated September 16, 1994. The violation involves several deficiencies associated with damage to an environmentally qualified pressure transmitter. The enclosure to this letter addresses the violation as described in the inspection report and the corrective actions taken by TVA.

TVA's submittal dated September 17, 1994, addresses the deviation cited in the subject inspection report.

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

Enclosure
cc: See page 2

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SEP 27 1994

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ENCLOSURE

WATTS BARR NUCLEAR PLANT UNIT 1
RESPONSE TO NRC'S SEPTEMBER 16, 1994, LETTER TO TVA
NRC VIOLATION 50-390/94-55-02

DESCRIPTION OF VIOLATION 50-390/94-55-02

"10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

Tennessee Valley Authority Quality Assurance Plan NQA PLN89-A, Revision 4, paragraph 6.1.1, requires that quality-related activities shall be prescribed by documented procedures and instructions appropriate to the circumstances. Activities shall be accomplished in accordance with these procedures and instructions.

Site Standard Practice SSP-12.07, Housekeeping/Temporary Equipment Control, Revision 8, paragraph 2.2, Reporting/Correcting Deficiencies, requires that deficiencies (hardware problems) be reported on plant process equipment by work requests in accordance with Site Standard Practice SSP-6.02, Maintenance Management System, Revision 13.

Site Standard Procedure SSP-6.02, Appendix B, Entry 7, requires that a detailed description of the problem is to be entered, with as much information as possible, so that a work request can be adequately planned. Appendix B of Site Standard Practice SSP-6.02 also requires that the date be entered on the work request card.

Modification and Addition Instruction MAI-4.4B, Instrument and Instrument Panel Installation, paragraph 6.2.F, requires that instruments that mount by threaded connections and do not perform a pressure boundary function shall be installed in accordance with site engineering approved vendor drawings/manuals. Further, site engineering approved vendor manual WBN-VTD-F180-0230 requires the mounting bolts attaching environmentally qualified pressure transmitters 1-PT-1-27A, 1-PT-1-27B, 1-PT-1-2A, and 1-PT-1-2B, to their mounting brackets, be torqued to 40 ft lb.

Contrary to the above, on August 10 and 18, 1994, the following were identified:

1. A work request was not initiated to report a deficiency on plant process equipment, in that a missing condulet cover, damaged conductors, and loose mounting bolts were found on environmentally-qualified Pressure Transmitter 1-PT-1-27B.

2. A detailed description of a deficiency was not entered on Work Request C260816 which was placed on Pressure Transmitter 1-PT-1-27B. The work request stated, "Wiring insulation has nick" when, in fact, damage to the installed wire insulation was extensive and bare conductor strands were exposed.

3. Work Request C260852 was initiated to perform splice and wire inspections on environmentally-qualified Pressure Transmitters 1-PT-27A, 1-PT-1-2A, and 1-PT-1-2B. However, the work request did not contain a detailed description of the work scope or problem, and the work request was not dated.

4. A work request was not initiated to tighten the mounting hardware for Pressure Transmitter 1-PT-1-27B which was loose.

5. Environmentally-qualified Pressure Transmitters 1-PT-1-27A, 1-PT-1-27B, 1-PT-1-2A, and 1-PT-1-2B, which mount by threaded connections, were not installed in accordance with site engineering approved vendor drawings/manuals, in that, mounting bolts which attach the above-cited pressure transmitters to their respective mounting brackets were snug-tightened."

TVA RESPONSE, EXAMPLES 1 AND 4

TVA agrees with the violation examples as stated.

REASON FOR THE VIOLATION, EXAMPLES 1 AND 4

The cause of the stated violation examples was the failure of the responsible person for the damage to identify the deficiency in accordance with Site Standard Practice (SSP)-6.02, "Maintenance Management System."

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED, EXAMPLES 1 and 4

The person responsible for damaging the subject transmitter is unknown. To remind employees of their responsibilities and reenforce managements' expectations, a series of "standdown" sessions have been conducted among TVA management and craft to discuss avoidable problems recently identified by TVA and the NRC with respect to damaged equipment/hardware.

In addition, as part of the corrective action associated with problem evaluation report (PER) WBPER940436, initiated to address this deficiency, a training bulletin was issued to the craft, informing them of the continuing problems with damage to plant equipment. This bulletin also stresses the importance of taking adequate protective measures to prevent damage to plant equipment and the reporting of accidental damage. A review by TVA to determine if similar conditions are being identified for correction, found a listing of numerous work requests initiated in the last three months identifying similar conditions which indicates that deficiencies are being identified and documented. These work requests are in addition to the deficiencies identified by the damaged, loose, and missing hardware (DLMH) walkdown personnel.

Work Request C260834 was issued August 17, 1994, to retorque pressure transmitter 1-PT-001-0027B-E. This work was completed August 29, 1994.

CORRECTIVE STEPS BEING TAKEN TO AVOID FURTHER VIOLATION, EXAMPLES 1 and 4

Personnel have been reminded of their responsibilities to identify deficiencies found during routine work activities, notify their supervisor, or initiate appropriate documentation. In addition, SSP-12.55, "Control of Sensitive Equipment," has been issued to provide guidelines for protecting sensitive equipment.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED, EXAMPLES 1 AND 4

The identified damage has been corrected. Employees have been reminded of their responsibilities and managements' expectations.

TVA RESPONSE, EXAMPLES 2 AND 3

TVA agrees with the violation examples as stated.

REASON FOR THE VIOLATION, EXAMPLES 2 AND 3

These examples of violation resulted from lack of attention to detail by the preparer. The preparer failed to complete all of the information on the top half of the card as required by SSP-6.02. However, the top half of the card is traceable to the bottom half of the card, which provides the information necessary for the work plan writer to initiate a work plan.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED, EXAMPLES 2 AND 3

The individual responsible for preparing the subject tag has been counseled regarding this deficiency and the importance of completing the required entries.

A review of work request cards installed in the plant identified additional examples of tags not being completely filled out. In an effort to provide attention to these deficiencies, WBN has issued a site bulletin re-emphasizing the importance of complying with procedures.

CORRECTIVE STEPS BEING TAKEN TO AVOID FURTHER VIOLATION, EXAMPLES 2 AND 3

Applicable personnel have been made aware of their responsibilities for complying with procedural requirements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED, EXAMPLES 2 AND 3

Corrective action steps taken to correct the identified deficiencies have been completed.

TVA RESPONSE, EXAMPLE 5

TVA agrees with the violation example as stated.

REASON FOR THE VIOLATION, EXAMPLE 5

This example of violation resulted from the workplan writer and the technical reviewer failing to include the vendor manual requirements for torque in the workplans. Workplan D-05054-04 was written to install pressure transmitters 1-PT-0002A, 0002B, and 0027B. Workplan D-05054-02 was written to install Foxboro Conversion kits in the subject transmitters. Workplan D-04928-02 also installed a new panel and relocated transmitter 1-PT-0027A. The kits were installed with the transmitters in place except for 1-PT-1-0027A, which was removed to install the Foxboro Conversion kit. The workplan writer and technical reviewer failed to include the vendor installation requirements for torque. In addition, the field engineer responsible for the installation inappropriately determined that the requirements for installing the transmitter bracket snug tight, also applied to the installation of the Foxboro Pressure Transmitters.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED, EXAMPLE 5

The four Foxboro transmitters originally installed snug tight have been reinstalled utilizing the vendor requirements. A review was conducted of five workplans completed by the same workplan writer and technical reviewer to determine if there were additional examples of omitted vendor requirements. No additional examples were identified. This is consistent with expectations because the deficient workplan was initiated before implementation of the corrective actions associated with Violation 50-390/93-27-01, which included training personnel involved in writing work orders on how to process vendor information.

CORRECTIVE STEPS BEING TAKEN TO AVOID FURTHER VIOLATION, EXAMPLE 5

The corrective steps taken by TVA in response to Violation 50-390/93-27-01 should prevent further violation.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED, EXAMPLE 5

Corrective action steps taken to correct the identified deficiency have been completed.