



Tennessee Valley Authority Post Office Box 2000 Spring City Tennessee 37381

NOV 09 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,  
391/94-58 - REPLY TO NOTICE OF DEVIATION AND NOTICE OF VIOLATION

The purpose of this letter is to provide a reply to Notice of Deviation 390/94-58-02 and Notice of Violation 390/94-58-03 cited in the subject Inspection Report dated October 6, 1994. The notice of deviation identifies a failure to allow sufficient time for NRC review of a preoperational test instruction in accordance with WBN Final Safety Analysis Report commitments. The violation identifies a failure to comply with administrative requirements for the use of Operations night orders. TVA's response to the deviation and violation is provided in Enclosure 1 and Enclosure 2, respectively. Enclosure 3 provides a list of commitments made in this submittal.

If you should have any questions, contact Bruce S. Schofield at (615)-365-1550.

Sincerely,

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

Enclosures

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Enclosures

cc (Enclosures):

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO NRC'S OCTOBER 6, 1994, LETTER TO TVA  
NRC DEVIATION 50-390/94-58-02

DESCRIPTION OF DEVIATION

Final Safety Analysis Report (FSAR), Chapter 14, Initial Test Program, paragraph 14.2.7.4.B, states that approved preoperational test procedures for satisfying FSAR testing commitments will be made available for review by regional NRC personnel approximately 30 days prior to their intended use.

In deviation from the above commitment, Preoperational Test Instruction (PTI) 99-03, RPS Operational Check, Revision 0, was approved by the licensee and given to the NRC for review on August 23, 1994. At the licensee's request, the NRC agreed to concur on the procedure one section at a time, to accommodate the licensee's test schedule. On September 2, 1994, the NRC notified the licensee of their concurrence with the performance of section 6.1 after changes were made to resolve NRC inspector comments. On September 4, 1994, the licensee began to perform section 6.2 prior to completion of NRC review or concurrence.

ADMISSION OR DENIAL OF DEVIATION

TVA agrees with the deviation as stated.

REASON FOR THE DEVIATION

The deviation occurred as a result of a decision by the Startup Manager to proceed with testing in Section 6.2 of the test procedure prior to completion of the NRC review of that section. As discussed with NRC representatives, that decision was made with the recognition that performance of Section 6.2 was being performed at risk; if comments were later received from NRC which invalidated any of the testing, the testing would require repeating. Testing in Section 6.1 had gone well and was completed ahead of schedule, and the test personnel and plant conditions necessary for performance of Section 6.2 were still in place. As a result, TVA considered that further progression into the PTI could be accomplished efficiently and expeditiously. There was no intent to mislead the NRC on the decision to proceed. Although an NRC representative was informed of our plans, TVA acknowledges that NRC management personnel should have been consulted. When the staff notified TVA of their disagreement with our decision, testing was terminated until the NRC review was completed.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

This matter has been discussed with NRC representatives at some length. Startup Management understands the staff's concerns over the concept of testing at risk and the need to comply with the FSAR commitments concerning NRC review of preoperational test instructions. This deviation is considered an isolated incident, for which no further action is required.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA is currently in compliance.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO NRC'S OCTOBER 6, 1994, LETTER TO TVA  
NRC VIOLATION 50-390/94-58-03

DESCRIPTION OF VIOLATION

10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, and Tennessee Valley Authority's approved Nuclear Quality Assurance Plan require in part that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

Site Standard Practice (SSP) 12.01, Conduct of Operations, Revision 6, Section 2.2.0, requires the following:

- that general information such as administrative policy and limitations of access to certain areas and equipment be included in standing orders;
- that night orders be approved by the operations superintendent or his designee;
- that night orders be reviewed weekly to identify outdated or no longer needed night orders.

Contrary to the above, on September 5, 1994, the following discrepancies were identified:

- A night order dated August 11, 1994, provided access control policy and guidance which should have been included in a standing order.
- Operations personnel had been reviewing the night order log only monthly, leading to out of date or no longer needed night orders remaining in the control room. Examples included night orders dated August 5, 1994, August 17, 1994, and August 25, 1994.
- Additional information was added to a night order dated September 2, 1994, without approval.

ADMISSION OR DENIAL OF VIOLATION

TVA agrees with the violation as stated.

REASON FOR THE VIOLATION

The failure to properly classify a night order which contained access control requirements occurred as a result of personnel inattention to detail.

Failure to perform night order reviews within the required frequency resulted from a data-entry error in the computerized tracking system used by Operations. Insufficient self-checking contributed to this error. The tracking system has been in place for approximately one year and is a management tool used to track various Operations' administrative actions using a calendar format. In addition to tracking periodic requirements of

administrative procedures, the system reflects daily meetings, reports, etc. In the specific example, the requirement to review night orders had been inadvertently inputted in the tracking system with a monthly frequency instead of weekly as required by SSP-12.01.

Improper approval of the revised night order resulted from failure by the Operations department to properly define and assign personnel to perform "designee" duties specified in SSP-12.01.

In addition, the subject deviations from the requirements of SSP-12.01 should have been identified by Operations on-shift personnel.

#### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. The logbook for night orders and standing orders was reviewed and corrected to ensure that orders which were outdated or no longer needed were removed. In addition, this review determined that other night orders and standing orders are correctly classified. The inappropriate night order for access control and the improperly approved night order dated September 2, 1994, were removed from the logbook.
2. The SSP-12.01 requirement to perform weekly reviews of night orders has been programmed in the Operations computer tracking system.
3. TVA confirmed that other SSP-12.01 requirements for periodic actions are correctly translated into the Operations tracking system.
4. Operations personnel were provided with interim guidance regarding approval signatures for night orders and standing orders.
5. The Operations Manager discussed this issue with the Operations Superintendent including the need for strict procedure adherence and need to ensure management expectations are understood and implemented. These expectations for night orders and standing orders were provided to shift operating supervisors and Operations duty managers.

#### CORRECTIVE ACTION TAKEN OR PLANNED TO PREVENT FURTHER VIOLATION

1. Operations will begin using the established Site Scheduling System (P2) to schedule their periodic requirements contained in site administrative procedures. These requirements will be reflected in the P2 system prior to December 16, 1994.
2. SSP-12.01 will be revised by November 23, 1994, to (1) Clarify differences between night orders and standing orders, and (2) Clarify requirements regarding those personnel authorized to approve night orders and standing Orders.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the specific violation, TVA is currently in compliance. The remaining actions will be complete by December 16, 1994.

ENCLOSURE 3

LIST OF COMMITMENTS

Violation 390/94-58-03

1. Operations will begin using the established Site Scheduling System (P2) to schedule their periodic requirements contained in site administrative procedures. These requirements will be reflected in the P2 system prior to December 16, 1994.
2. SSP-12.01 will be revised by November 23, 1994, to (1) Clarify differences between night orders and standing orders, and (2) Clarify requirements regarding those personnel authorized to approve night orders and standing orders.