



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

DEC 16 1994

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

In the Matter of the Application of )  
Tennessee Valley Authority ) Docket Nos. 50-390  
50-391

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 AND UNIT 2 - NRC INSPECTION REPORT  
NO. 50-390, 391/94-66 - REPLY TO NOTICE OF DEVIATION

The purpose of this letter is to provide a reply to Notice of Deviation  
390/94-66-02 cited in the subject Inspection Report dated November 16, 1994.  
The Notice of Deviation involves the closure of Vertical Slice Review  
Discrepancy Report 89.

Enclosure 1 provides TVA's response. Enclosure 2 contains a list of  
commitments made in this letter.

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

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

Enclosures  
cc: See page 2

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U.S. Nuclear Regulatory Commission

Page 2

DEC 16 1994

cc (Enclosures):

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ENCLOSURE 1  
WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO NRC'S NOVEMBER 16, 1994, LETTER TO TVA  
NRC DEVIATION 50-390/94-66-02

DESCRIPTION OF DEVIATION

During an NRC inspection conducted September 19 through October 21, 1992, a deviation from a written commitment was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the deviation is listed below:

On September 6, 1991, the Tennessee Valley Authority submitted Revision 1 of the Watts Bar Nuclear Performance Plan (WBNPP), to the NRC. Volume 4, Chapter II, Section 6.2 of the WBNPP states:

"... in many cases the significance was not determined prior to the time the VSR Report was issued. These discrepancies are being evaluated for significance as part of the corrective action process."

This commitment was implemented by Administrative Instruction AI-11.3, Disposition of Vertical Slice Review Team Information Requests, Discrepancies, and Adverse Trends, Revision 3, Sections 6.7 and 6.8.

WBNPP, Volume 4, Chapter IV, Section 3.2 states:

To assure the fulfillment of commitments made in resolving the VSR DRs, the site procedure which controlled the actions of the line organization in resolving the DRs was revised to provide stringent requirements for closure of DR and VSR findings. This procedure requires that the corrective actions for each DR be listed on a VSR Closure Form (Appendix I of WBN procedure AI-11.3).

This commitment is implemented by Site Standard Practice SSP-4.A, Disposition of Vertical Slice Review Team Information Requests, Discrepancies, and Adverse Trends, Revision 4, Appendix I, Section B, which required that objective evidence of completion of corrective actions be attached to Vertical Slice Review Discrepancy Report closure forms.

Contrary to the above, WBNPP commitments were not implemented as follows:

- In November 1991, Administrative Instruction AI-11.3, Revision 3, was superseded by Site Standard Practice SSP-4.A, Revision 0. However, the requirement to perform design and safety significance determinations as part of the corrective action process was not translated into the new procedure. This resulted in the closure of Vertical Slice Review Discrepancy Report 89 with neither a design significance nor a safety significance review being performed.

- On November 19, 1992, Vertical Slice Review Discrepancy Report 89 was closed without the attachment of objective evidence of the completion of corrective actions for Condition Adverse to Quality Reports (CAQRs) WBP880040, WBP880418, or WBP880167 to the Vertical Slice Review Discrepancy Report closure form.

#### ADMISSION OR DENIAL OF DEVIATION

TVA agrees with Part 1 of the deviation. TVA disagrees that DR-89 was closed without proper objective evidence. This issue is addressed separate from the discussion for Part 1.

#### REASON FOR THE DEVIATION - PART 1

The procedural requirements for the performance of a significance evaluation prior to closure of a discrepancy report (DR) were omitted during the development of SSP-4.A. Revision 4 of AI-11.3 controlled the design-significance evaluation process for DRs. As part of a sitewide procedural upgrade program, AI-11.3 was rewritten and issued as SSP-4.A, and as stated in the Notice of Deviation, the requirements for performance of the design-significance review were not captured in the transition. Therefore, when DR-89 was closed, there was no procedural requirement for performance of the design-significance review.

The cause for the omission is that an evaluation performed by TVA on the 165 DRs designated as "significance not yet determined" showed that the discrepancies still needing a design-significance review would be resolved under an existing Corrective Action Program (CAP), Special Program (SP) or other corrective action document. Therefore, the procedure writers believed that there was no need to incorporate the significance review process into SSP-4.A.

#### CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER DEVIATION - PART 1

The adverse condition cited in this Notice of Deviation has been documented in TVA's Corrective Action Program as Problem Evaluation Report (PER) WBP940554. The corrective actions defined for the PER include:

- Revision 5 of SSP-4.A was issued on December 3, 1994, to reinstate the requirements to perform the evaluations of DRs for design and safety significance. This revision also made it clear that objective evidence of the performance a design-significance review must be included in the closure package of the DR.
- For the DRs which have been closed and are one of the 165 which were designated as "Significance not yet determined," a review will be performed to assure that an adequate design-significance evaluation has been performed. For any of those in which an evaluation has not been performed or the evaluation is found to be inadequate, an evaluation will be performed in accordance with the requirements reinstated in SSP-4.A.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED - PART 1

The corrective actions, with respect to this specific deviation, will be finalized with the closure of PER WBP940554. Closure will be accomplished by February 14, 1995.

DENIAL OF PART 2 OF THE NOTICE OF DEVIATION

TVA does not agree that objective evidence for closure of DR-89 was not provided in the closure package. A portion of the description of DR-89 states:

"This type of discrepancy has been previously identified and documented in CAQRs WBP880040, WBP880418, WBP880167."

These three CAQRs and DR-89 are listed in the Corrective Action Plan (CAP) Matrix for the Cable Tray and Cable Tray Support CAP and involve deficiencies in the design and installation of cable tray supports and cable tray connection fittings. The resolution of these issues is encompassed within the Cable Tray and Cable Tray Supports CAP, which includes provisions for determining the extent of condition and any resultant corrective actions and/or hardware modifications. The purpose of mentioning these CAQRs in the description of DR-89, was to merely identify similar issues. The intent was not to imply that resolution and closure of the CAQRs was required for closure of DR-89.

The specific corrective action for DR-89, which was not a programmatic element of the CAP, required the revision of Design Criteria WB-DC-20-21.1, which incorporated appropriate elements of calculations 50054.02-C-001 and 50054.02-C-002. The closure package for DR-89 appropriately referenced these documents, all of which can be identified and retrieved for review. However, a review of the cited condition showed that SSP-4.A could be clarified to ensure consistency in the closure documentation for DRs. This clarification will be made by January 27, 1995, to define requirements for the degree of documentation necessary for use during the closure reviews and the degree of documentation to be subsequently placed in the document control system.

ENCLOSURE 2

SUMMARY OF COMMITMENTS

1. For the DRs which have been closed and are one of the 165 which were designated as "Significance not yet determined," a review will be performed to assure that an adequate design-significance evaluation has been performed. Those for which an evaluation has not been performed or the evaluation is found to be inadequate, will be evaluated in accordance with the requirements reinstated in SSP-4.A. The corrective actions, with respect to this specific deviation, will be finalized with the closure of PER WBP940554. Closure is currently scheduled for February 14, 1995.
2. However, a review of the cited condition showed that SSP-4.A could be clarified to ensure consistency in the closure documentation for DRs. This clarification will be made by January 27, 1995, to define requirements for the degree of documentation necessary for use during the closure reviews and the degree of documentation to be subsequently placed in the document control system.