



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

SEP 01 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) - NRC INSPECTION REPORT NO. 50-390,
391/84-14, NOTICE OF VIOLATION (NOV) 391/86-14-03

The subject violation was issued because measures were not established to ensure that deviations from quality standards are controlled in that General Design Specifications were not considered as mandatory requirements by Division of Nuclear Engineering personnel. Design procedures did not provide guidance to designers to properly control deviations from specifications.

As a result of the violation, TVA committed to perform a number of corrective actions including (1) revision of affected design criteria, (2) providing for future modifications and new supports to include locking devices on component part bolted connections, (3) revised training for maintenance personnel, and (4) revision to the Final Safety Analysis Report (FSAR) to remove references to implementing documents and properly characterize commitments as they relate to applicable codes, standards, and regulatory requirements.

TVA has implemented the commitments as stated with the exception of the FSAR revision. From a review of the issues associated with the violation as stated, TVA believes that the revision to the FSAR does not resolve any of the violation concerns for the following reasons. The FSAR has been baselined by Amendments 73 through 88 to assure the accuracy of the statements contained in the FSAR. Through the baselining effort, which was created subsequent to the violation, TVA determined that referencing of implementing documents is an acceptable practice which in many cases

06/0013

9409130163 940901
PDR ADDCK 05000390
Q PDR

IEO/
1/0

U.S. Nuclear Regulatory Commission

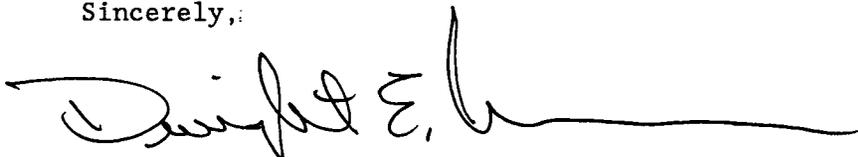
Page 2

SEP 01 1994

identifies how TVA implements Regulatory Guides and specifies exceptions which are utilized by the NRC staff to perform their review of the plant design, as specified in Regulatory Guide 1.70. The use of the G-Specs references is included to support NRC review and to comply with the staff's requirement for clear, concise, complete and accurate report of information. The specific violation associated with General Construction Specification G-53, "ASME Section III and non-ASME Section III Bolting Material," is not referenced in the FSAR. Furthermore, upon issuance of the Operating License, the plant design and configuration is ensured through the application of the 10CFR50.59 rule. Therefore, since the specific material aspects of the violation have been completed, TVA considers that this commitment with respect to amending the FSAR is not required to address the violation and is hereby rescinded. This has been discussed with the Nuclear Reactor Regulation Project Manager and the Senior Resident Inspector.

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

cc: 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