



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

OCT 12 1995

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, 391/87-05 - REVISED RESPONSE TO NOTICE OF VIOLATION

The purpose of this letter is to provide a revised response to Notice of Violation 390/87-05-01 for Unit 1 cited in the subject Inspection Report dated May 15, 1987. The violation involves inadequate design control regarding vendor information and deficiencies regarding classes of cleanness.

In order to address questions raised by NRC and to finalize the planned corrective action, Violation 390/87-05-01 has been the subject of several letters (itemized in Enclosure 2) to NRC. The changes in this revision are being made to make this response consistent with the implementation of the Vendor Information Corrective Action Plan (CAP) and the Design Baseline and Verification Program (DBVP) CAP.

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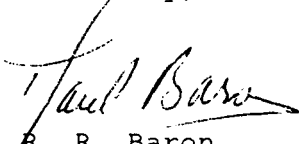
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Enclosure 1 defines the final set of actions being taken by TVA. Therefore, this letter supersedes previous submittals regarding Violation 390/87-05-01.

If you should have any questions, please contact P. L. Pace at (423) 365-1824.

This submittal contains no new commitments.

Sincerely,



R. R. Baron  
Nuclear Assurance  
and Licensing Manager (Acting)

Enclosures

cc: (Enclosures):

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ENCLOSURE 1  
WATTS BAR NUCLEAR PLANT UNIT 1  
REVISED RESPONSE TO NRC'S MAY 15, 1987, LETTER TO TVA  
NRC VIOLATION 50-390/87-05-01

DESCRIPTION OF VIOLATION:

"10 CFR 50, Appendix B, Criterion III, as implemented by the Quality Assurance (QA) Topical Report, Rev. 8, Paragraph 17.1.3, "Design Control," requires that control measures for the selection of suitable materials, parts, equipment, and processes are provided through the licensee's design guides, standards, and specifications, and industry standards and specifications.

Table 17D-2 of the QA Topical Report endorses American National Standards Institute (ANSI) Standards N45.2.1-1973, which requires that the class of cleanness required for any given application be specified in design drawings or specifications as referenced in section 3.1 of the standard.

Contrary to the above, applicable regulatory requirements and design bases were not correctly translated into specifications, drawings, procedures, and instructions as follows:

EXAMPLE 1 OF VIOLATION 390/87-05-01

Critical installation requirements, i.e., vendor requirements for the hydrogen analyzer sample lines, were not considered or included by specifications, drawings, procedures, or instructions."

TVA RESPONSE - EXAMPLE 1

TVA agrees with the violation example as stated.

REASON FOR THE VIOLATION - EXAMPLE 1

The cause analysis performed in relation to this violation indicates that inadequate controls existed to ensure vendor information would be properly translated into design documents.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The actions to correct the specific deficiencies related to the installation of the hydrogen analyzers were consolidated into Condition Adverse to Quality Report (CAQR) WBP900397SCA. TVA's actions included the installation of isolation valves inside and outside of containment to meet the isolation requirements of Design Criteria WB-DC-40-34, installation of vacuum trap assemblies to address the slope related issues, and the elimination of the air supply from the Station Air Compressor by replacing it with bottled air supplies. These actions have been completed and CAQR WBP900397SCA has been closed.

#### CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

CAQR WBP870701 was issued to track the generic deficiency regarding inadequacy in the implementation of vendor requirements. The required actions for the CAQR have been completed and the CAQR has been closed. CAQR WBP870701 is listed in Attachment 1 to the Vendor Information (VI) CAP as a basis document for the CAP. The corrective measures of the VI CAP supersede the actions previously defined in TVA's responses to this violation regarding deficiencies in the use and control of vendor information. Revision 4 of the VI CAP was submitted to NRC on February 4, 1993, and the CAP has now been essentially completed. NRC's latest review of the implementation of the VI CAP is documented in Inspection Report 390, 391/95-51. Inspection 390/95-67 is currently in process and is reviewing the implementation of the VI CAP.

In addition, the series of letters associated with this deficiency made statements regarding planned revisions to the design change process. As with the vendor documentation problems, the upgrade of the design change process was an element of a CAP, Section 4.4 of the DBVP CAP. NRC's review and acceptance of the implementation of the DBVP CAP is documented in Inspection Report 390/95-47.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the cited deficiency, TVA has implemented the specified corrective actions. TVA considers the corrective action to have been effective in ensuring safety significant vendor requirements have been addressed.

#### EXAMPLE 2 OF VIOLATION 390/87-05-01

"Classes of cleanness were not prescribed in specifications or drawings for equipment in an "in-place" storage status."

#### TVA RESPONSE - EXAMPLE 2

TVA agrees with the violation example stated.

## REASON FOR THE VIOLATION - EXAMPLE 2

The cause analysis performed in relation to this violation indicates that proper controls were not in place to maintain compliance with upper-tier requirements.

## CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The necessary ANSI cleanliness requirements have been incorporated into ER-WBN-MEB-004. Subsequently, ER-WBN-MEB-004 was replaced by Engineering Specification N3M-938, "Cleaning and Cleanness of Fluid Systems and Components," in March 1991. NRC's review and acceptance of specification N3M-938 is documented in Inspection Report 390/91-31.

TVA's November 8, 1991 and March 8, 1994, letters defined a series of actions to establish conformance with ANSI Standards. These letters superseded TVA's previous response on this example. The corrective actions defined in these letters were also the corrective actions established for resolution of Corrective Action Tracking Document (CATD) 80109-WBN-03. The development and implementation of the corrective action plan for the CATD was the principal criteria which defined the steps taken to establish conformance to applicable ANSI Standards. The actions implemented for resolution of the CATD focused on verifying implementation of the ANSI Standards endorsed in the Nuclear Quality Assurance Plan (NQAP). Credit was taken for the verifications of the Final Safety Analysis Report (FSAR) and the Safety Evaluation Report (SER) by the Program for Assurance of Quality and Assurance of Completion (PAC/AQ). The required corrective actions for the CATD have been completed and the CATD was closed by TVA's Concerns Resolution staff on August 11, 1995.

## CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

The actions defined for CATD 80109-WBN-03 established appropriate controls to prevent recurrence of this type of deficiency.

## DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The required corrective actions were addressed through the implementation and closure of the corrective actions defined for CATD 80109-WBN-03. With respect to the cited example, TVA is in full compliance.

ENCLOSURE 2

DOCUMENTS ADDRESSING VIOLATION 390/87-05-01

1. NRC's letter to TVA dated May 15, 1987, Inspection Report 390, 391/87-05
2. TVA's letter to NRC dated June 18, 1987, Region II Inspection Report 50-390/87-05 and 391/87-05 - Response to Violation
3. NRC's letter to TVA dated August 11, 1987, NRC Inspection Report 50-390/87-05 and 391/87-05
4. TVA's letter to NRC dated October 6, 1987, Region II Inspection Report 50-390/87-05 and 391/87-05 - Revised Response
5. TVA's letter to NRC dated January 15, 1988, Region II Inspection Report 50-390/87-05 and 391/87-05 - Status Update to Violation 390, 391/87-05-01 and ANSI Verification Activities
6. TVA's letter to NRC dated July 26, 1988, Inspection Report Nos. 50-390/87-05 AND 50-391/87-05 - Status Update on Classes of Cleanness/Layup and American National Standards Institute (ANSI) Verification Program
7. TVA's letter to NRC dated September 15, 1988, Region II Inspection Report 50-390/87-05 and 391/87-05 - Status Update on Vendor Information Program and Final Response on American National Standard Institute (ANSI) - Final Safety Analysis Report (FSAR) Verification
8. TVA's letter to NRC dated July 13, 1989, Corrective Action Plan (CAP) Matrices
9. TVA's letter to NRC dated October 9, 1990, NRC Notice of Violation 50-390, 391/87-05-01, Part 2, Classes of Cleanness/Layup - Final Report
10. NRC's letter to TVA dated April 15, 1991, NRC Inspection Report Nos. 50-390/91-03 and 50-391/91-03
11. TVA's letter to NRC dated November 8, 1991, Revision 4, of the Design Baseline and Verification Program (DBVP) CAP
12. NRC's letter to TVA dated January 13, 1992, NRC Inspection Report Nos. 50-390/91-31 and 50-391/91-31
13. TVA's letter to NRC dated July 09, 1992, Corrective Action Program (CAP) Plan for Design Baseline and Verification Program (DBVP)
14. TVA's letter to NRC dated February 4, 1993, Revision 4, of the Vendor Information CAP

15. TVA's letter to NRC dated March 8, 1994, Revision 7, of the Design Baseline and Verification Program (DBVP) CAP
16. NRC's letter to TVA dated August 16, 1995, NRC Inspection Report 50-390/95-47 and 50-391/95-47
17. NRC's letter to TVA dated September 21, 1995, NRC Inspection Report No. 50-390/95-51 and 50-391/95-51