



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

JUL 02 1996

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

Gentlemen:

In the Matter of) Docket No. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - NRC INSPECTION REPORT NO.
50-390/96-04 AND 50-391/96-04 - REPLY TO NOTICE OF VIOLATION -
SUPPLEMENTAL LETTER

The purpose of this letter is to provide a supplemental reply for
Notice of Violation (NOV) 50-390/96-04-01 to address three
additional findings related to the original violation.

TVA's letter to NRC dated June 3, 1996, replied to the subject
violation which originally consisted of two examples of failure to
follow procedures. After NRC Inspection Report (IR) 50-390/96-04
was issued, three similar findings were identified. These were
discussed during the NRC residents' inspection exit interview
conducted on May 18, 1996, and subsequently included as additional
examples of NOV 50-390/96-04-01 in IR 50-390/96-06. Enclosure 1
provides TVA's supplemental reply to the NOV. Enclosure 2
provides the list of commitments being tracked by this letter.

As discussed during the May 10, 1996, TVA/NRC management meeting,
steps have been taken to increase site awareness of personnel
errors emphasizing the need for improvement.

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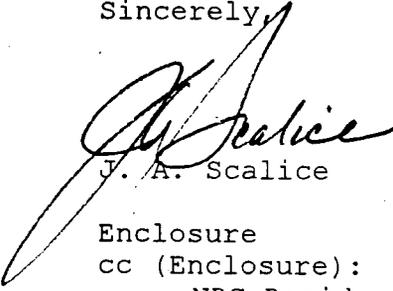
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The submittal date for this supplemental response was coordinated with the Region II staff on June 28, 1996. If you should have any questions, please contact P. L. Pace at (423) 365-1824.

Sincerely,



J. A. Scalice

Enclosure

cc (Enclosure):

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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNIT 1
SUPPLEMENTAL REPLY TO NOTICE OF VIOLATION (NOV)
NOV 50-390/96-04-01 (EXAMPLES 3-5)

NOTICE OF VIOLATION 50-390/96-04-01

Technical Specification 5.7.1.1 requires that written procedures shall be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. This includes procedures required for the safe operation and maintenance of nuclear power plants. Contrary to the above, two examples of failure to follow procedures were cited in IR 50-390/96-04 and 50-391/96-04. These two examples are addressed in TVA's letter to NRC dated June 3, 1996. Three more examples were identified after the report was issued. These are identified as Examples 3, 4, and 5 and are addressed as follows:

EXAMPLE 3

Contrary to General Operating Instruction (GO)-2, "Unit Startup From Cold Shutdown to Hot Standby," the unit operating crew did not reenergize the main feedwater pump (MFP) turbine trip busses prior to entry into Mode 2 from Mode 3 as required by procedure. Consequently, the Engineered Safety Feature Actuation System instrumentation for automatic start of the Auxiliary Feedwater System (AFW) was temporarily disabled for turbine trips involving both MFPs.

TVA RESPONSE - Example 3

TVA agrees that this violation example occurred.

REASON FOR THE VIOLATION - Example 3

This violation example occurred due to personnel error. Other contributing factors included an inadequate control board walkdown prior to mode change, inadequate shift turnover communications, and the Shift Operating Supervisor (SOS) was actively involved in the task of startup which interfered with his overview role.

During the previous operating crew shift, the SOS authorized a deviation to the step sequence of GO-2. This deviation (permitted by procedures) bypassed the steps to reenergize the MFP turbine trip busses because the system alignment did not allow the MFPs to be reset once energized. At that time, energizing the trip busses would have resulted in an AFW start because the main steam isolation valves were closed on a clearance and the condenser vacuum pumps were tagged preventing reset of the MFP turbines. This information was communicated during shift turnover; however, the oncoming crew did not fully understand that energizing the MFP turbine trip busses was required for Mode 2 entry. Instead, the oncoming Assistant Shift Operating Supervisor (ASOS) and the SOS understood that the reason for not energizing the MFP trip busses was to prevent the AFW automatic actuation only. Consequently, the applicable procedure steps were bypassed and the MFP turbine trip busses were not energized prior to entry into Mode 2.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED - Example 3

Detailed corrective actions have been provided in TVA's letter to NRC dated May 30, 1996, under Licensee Event Report 50-390/96-017. In summary, corrective measures consisted of counseling for the SOS and ASOS involved in the procedural non-compliance, counseling the Shift Technical Adviser concerning control board walkdown expectations, inclusion of a briefing of the event in operator requalification training, and an evaluation of similar entries in the Licensee Condition for Operation (LCO) tracking log.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS - Example 3

TVA considers that the above actions are sufficient to address the condition and prevent further violations.

EXAMPLE 4

In accordance with Site Standard Practice (SSP)-12.01, "Conduct of Operations," Section 2.15.G, "In use main control room recorders should be checked once per shift to ensure they are running at proper speed, on time, inking, and have proper paper; then mark time, date and initials on the paper." Contrary to this requirement, the boric acid tank level recorder was not checked on May 13, 1996.

TVA RESPONSE - Example 4

TVA agrees that this violation example occurred.

REASON FOR THE VIOLATION - Example 4

This violation example occurred due to personnel error. The missed recorder is located in the Unit 2 control room area of the main control room under TVA unique identification number 2-LR-062-0238. In this location, it was easier for the operator to overlook the recorder.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED - Example 4

The individual involved and responsible supervisor have been counseled.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS - Example 4

The procedures have been revised to specifically address applicable instruments in the Unit 2 main control room areas.

EXAMPLE 5

System Operating Instruction (SOI)-82.01, "Diesel Generator (DG) 1A-A," Section 8.3, Steps 8 and 9, provide instructions to rotate the diesel engine through one revolution manually. Sign-off is required for each step to document that the steps have been accomplished. However, the steps were not signed off on April 24, 1996. Instead, the Assistant Unit Operator (AUO) marked Steps 8 and 9 "NA" (not applicable) after the diesel engine was manually rotated.

TVA RESPONSE - Example 5

TVA agrees that this violation example occurred.

REASON FOR THE VIOLATION - Example 5

It is not unusual for maintenance personnel to assist Operations with rotation of the diesel engine. On April 24, 1996, the diesel engine was rotated by maintenance personnel; however, the AUO mistakenly believed that the process was documented under the maintenance procedures. Consequently, the AUO inappropriately marked the steps "NA."

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED - Example 5

SOI-82.01 documentation has been corrected for the engine rotation that occurred on April 24, 1996.

The AUO involved has been counseled for the improper use of "NA" in the procedure steps.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS - Example 5

The SOI-82 series procedures involving the diesel generators have been revised to clarify responsibilities for engine rotation within the procedures. The steps for rotating the diesel engines may be performed by maintenance or operations personnel. The procedure allows maintenance to initial the engine rotation steps to signify the steps have been completed. Operations personnel may complete the rotation, but in all cases, these steps must be performed and initialed to signify they have been completed.

WBN will confirm that this condition does not exist in other SOIs by July 31, 1996.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED - Examples 3, 4, and 5

With respect to the examples discussed above, TVA will be in full compliance after completion of the SOI review discussed in example 5, above.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNIT 1
REPLY TO NOTICE OF VIOLATION (NOV)
NOV 50-390/96-04-01

1. WBN will confirm that this condition does not exist in other SOIs by July 31, 1996.