



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

November 22, 1989

Docket No. 50-390

Mr. Oliver D. Kingsley, Jr.  
Senior Vice President, Nuclear Power  
Tennessee Valley Authority  
6N 38 A Lookout Place  
1101 Market Street  
Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: SAFETY EVALUATION OF THE WATTS BAR UNIT 1 CORRECTIVE ACTION PROGRAM  
(CAP) PLAN FOR REPLACEMENT ITEMS PROGRAM (PIECE PARTS) (TAC 71922)

The NRC staff has completed its review of the programmatic aspects of the Watts Bar Unit 1 Corrective Action Program for piece parts. The CAP plan was submitted on December 14, 1988 and Revision 2 was submitted on August 7, 1989.

Based on the review of Revision 1 of the program plan in March 1989, the following concerns were discussed with TVA:

- a. That the CAP plan did not specifically address procurement of commercial grade replacement parts for seismically qualified or safety-related non-10 CFR 50.49 components.
- b. Whether sampling of installed seismically qualified components is appropriate to establish that replacement parts have not degraded the component's seismic capability.

WBN responded to the NRC concerns in a letter dated August 7, 1989 which contained Revision 2 to the CAP. The revision also documented introduction of a temporary Inventory Release Tracking Log to replace the Quality Release Program and deletion of the Conditional Release Log reviews and the installed item sampling.

The results of the staff review of revision 2 are as follows:

1. Section 4.1.2 now states that the parts list of the Environmental Qualification (EQ) equipment binders will be correlated to the inventory. Parts for use in EQ application will receive an engineering evaluation and dedication if required. Seismically sensitive electrically active, QA Level II devices and QA Level II metallic ASME pump and valve parts will be identified and receive an engineering evaluation and dedication if required. The staff believes that the above specifically addresses procurement of commercial grade replacement parts for seismically qualified or safety-related non-10 CFR 50.49 components.

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2. Section 4.1.3 has been rewritten with the term "sampling" deleted. As now written, the staff expects all inventory release documents to be screened to identify and locate unacceptable parts currently installed. This removes the staff question relative to "sampling".
3. The Quality Release mode (proper qualification prior to issue from inventory of parts for 10 CFR 50.49 component application and parts as commercial-grade for basic components) is the preferred mode. The Quality Release Program at WBN was in effect from January 23, 1989 until June 8, 1989. On June 8, 1989, the Inventory Release Tracking Log was initiated and will be in effect during the completion of a warehouse inventory review. This log will identify unreviewed parts and materials released for installation in safety related applications and allow their replacement should the inventory review indicate unacceptable parts. WBN management accepts the risks associated with the Inventory Release Tracking Log mode just as they had previously with the Conditional Release Log mode which was in effect prior to January 23, 1989. Other facets of the revised CAP compensate for deleting the Conditional Release Log reviews and the installed item sampling.

In conclusion, the staff finds that the CAP plan now establishes acceptable program guidelines for identification and resolution of problems in the area of replacement items (piece parts) at WBN. WBN is currently establishing and implementing detailed procedures to ensure the successful completion of this CAP. Prior to Unit 1 fuel load, the staff will review the results of this CAP to ensure the program has been adequately implemented. This review may include an onsite inspection of the program.

If you have any questions, please contact the NRC Project Manager, Raj Auluck at (301) 492-0759.

Sincerely,

Original signed by  
Suzanne C. Black, Assistant Director  
for Projects  
TVA Projects Division  
Office of Nuclear Reactor Regulation

cc: See next page

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Document Name: WBN PIECE PARTS CAP

cc:

General Counsel  
Tennessee Valley Authority  
400 West Summit Hill Drive  
ET 11B 33H  
Knoxville, Tennessee 37902

Mr. F. L. Moreadith  
Vice President, Nuclear Engineering  
Tennessee Valley Authority  
400 West Summit Hill Drive  
WT 12A 12A  
Knoxville, Tennessee 37902

Dr. Mark O. Medford  
Vice President and Nuclear  
Technical Director  
Tennessee Valley Authority  
6N 38A Lookout Place  
Chattanooga, Tennessee 37402-2801

Manager, Nuclear Licensing  
and Regulatory Affairs  
Tennessee Valley Authority  
5N 157B Lookout Place  
Chattanooga, Tennessee 37402-2801

Program Manager  
Watts Bar Nuclear Plant  
Tennessee Valley Authority  
P. O. Box 800  
Spring City, Tennessee 37381

Mr. D. E. McCloud  
Acting Site Licensing Manager  
Watts Bar Nuclear Plant  
Tennessee Valley Authority  
P. O. Box 800  
Spring City, Tennessee 37381

Mr. Richard F. Wilson  
Vice President, New Projects  
Tennessee Valley Authority  
6N 38A Lookout Place  
Chattanooga, Tennessee 37402-2801

Honorable Robert Aikman  
County Judge  
Rhea County Courthouse  
Dayton, Tennessee 37321

Honorable Johnny Powell  
County Judge  
Meigs County Courthouse  
Route 2  
Decatur, Tennessee 37322

Mr. Michael H. Mobley, Director  
Division of Radiological Health  
T.E.R.R.A. Building, 6th Floor  
150 9th Avenue North  
Nashville, Tennessee 37219-5404

Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, N.W.  
Atlanta, Georgia 30323

Senior Resident Inspector  
Watts Bar Nuclear Plant  
U.S. Nuclear Regulatory Commission  
Route 2, Box 700  
Spring City, Tennessee 37381

Dr. Henry Myers, Science Advisor  
Committee on Interior  
and Insular Affairs  
U.S. House of Representatives  
Washington, D.C. 20515

Tennessee Valley Authority  
Rockville Office  
11921 Rockville Pike  
Suite 402  
Rockville, Maryland 20852