

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

August 13, 1980

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNIT 1 - NRC-OIE REGION II LETTER
RII:JAM 50-390/80-16 - REVISED RESPONSE TO INFRACTION 50-390/80-16-01

The subject letter cited TVA with an infraction for failure to follow procedures for QA and QC records. The response to this infraction provided in my letter to you dated July 15, 1980, has been revised to clarify the Action Taken to Prevent Recurrence for item 2. The enclosed response supersedes the information forwarded on July 15, 1980.

If you have any questions concerning this matter, please get in touch with D. L. Lambert at FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Jr., Director (Enclosure) ✓
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNIT 1
FAILURE TO FOLLOW PROCEDURES FOR QA AND QC RECORDS
INFRACTION 50-390/80-16-01

Infraction 50-390/80-16-01

As required by 10CFR50, Appendix B, Criterion V, and implemented by Watts Bar Nuclear Plant FSAR Section 17.1A.5, activities affecting quality must be prescribed by appropriate instructions and be accomplished in accordance with documented instructions. Section 5.3 of Watts Bar Nuclear Plant Quality Control Procedure (WBNP-QCP) 1.2, Control of Nonconforming Items, requires that the responsible construction engineer's office unit supervisor tag inprocess nonconforming items. Section 2.4 of Quality Assurance Staff Procedure 4.7, Review of Significant NCR's for Action to Prevent Recurrence, requires the supervisor of the Quality Assurance Unit to review significant nonconformance reports (NCR's) and initial if action required to prevent recurrence is acceptable. Section 4.b of the Office of Engineering Design and Construction Quality Administrative Instruction 4, Determining, Reporting and Correcting Conditions Adverse to Quality, requires the QA organization to review nonsignificant NCR's to concur in the determination that they are, indeed, nonsignificant. Section 6.3 of WBNP-QCP-1.8, Quality Assurance Records, requires Responsible Engineering Units to submit lists of "Life of Plant" and "Duration of Construction" quality assurance records to the Quality Control and Records Unit.

Contrary to the above, as of May 30, 1980:

1. Valves, fittings, flexible couplings and other code items listed on NCR 2267R, initiated April 18, 1980, had not been tagged as nonconforming items.
2. Eight of 25 NCR's inspected had not been reviewed by the supervisor of the Quality Assurance Unit.
3. Site implementing procedures did not contain appropriate requirements for Quality Assurance organization review of nonsignificant NCR's and such a review was not being performed.
4. The Responsible Engineering Units had not generated or submitted lists of QA records to the Quality Control and Records Unit with record retention periods specified.

Corrective Action Taken and Results Achieved

- Item 1 - The NCR 2267R involved in this noncompliance did nonconform the storage conditions of materials within a specific room. These materials had been previously issued to the craft for installation, but had not yet been installed. Starting on April 18, 1980, as items in the room were identified by engineering, they were cleaned and returned to the warehouse

in accordance with WBNP-QCP-1.6, "Receipt, Inspection, Storage, Withdrawal, and Transfer of Permanent Material." Some of the items were required for installation and were installed in accordance with the appropriate Quality Control Procedures, rather than being returned to the warehouse. Any items which could not be specifically identified by engineering were scrapped. This work was in process on May 27, 1980, when it was observed that the nonconformance tag had not been placed on the door to the room. The responsible engineer, upon obtaining the nonconformance number from the inspector, did manufacture and affix the nonconformance tag to the door of the room as required by WBNP-QCP-1.2, "Control of Nonconforming Items," on May 27, 1980. The identification and cleaning of this material continued until June 10, 1980, when all of the loose items had been returned to warehouse storage, installed, or scrapped as appropriate. No potential adverse effects from the storage of these items is expected since they have been installed in accordance with the appropriate Quality Control Procedures which would verify material and assure cleanliness prior to installation.

- Item 2 - The NCR's in question have been reviewed by the Quality Assurance Supervisor.
- Item 3 - It is TVA's position that the routing of a copy of all NCR's to OEDC-QA fulfills the requirements of independent QA review for significance. We agree that this position is not spelled out in our site NCR procedure. We will include it in our next procedure revision.
- Item 4 - Existing lists of QA records and their retention periods fulfill the requirement that the retention period be specified for QA records. We also are now including the retention period on all QCI/QCP attachments which become LOP or DOC documents. We plan to revise WBNP-QCP-1.8 Quality Assurance records to reflect this.

Action Taken to Prevent Recurrence

- Item 1 - Subsequent investigation revealed that WBNP-QCP-1.2 did not require the NCR initiator to be informed when the number is assigned to the NCR by the Quality Control and Records Unit. This lack of feedback to the initiator may result in the NCR red tag not being manufactured and installed on the item in a timely manner. To rectify this, WBNP-QCP-1.2 shall be revised to require prompt notification of the NCR initiator of the NCR number when it is assigned by the Quality Control and Records Unit. A procedure is being issued to assure that no similar conditions shall be allowed to develop in the future and craft have been reinstructed concerning the stockpiling of QA materials.

- Item 2 - WBNP-QCP-1.2, "Control of Nonconforming Items," had not been changed to reflect change in CONST QAP-15.1, "Control of Nonconformances." The latest revision of QAP-15.1 requires that all significant NCR's be reviewed by the QA supervisor. While most significant NCR's were being reviewed in accordance with QAP-15.1, WBNP-QCP-1.2 had no requirement for this review, and consequently some significant NCR's did not get reviewed. WBNP-QCP-1.2 is in the process of being changed to reflect requirement of CONST QAP-15.1.
- Item 3 - Requirements for independent QA review for significance of nonconforming conditions are presently being met. Therefore, no further action is required.
- Item 4 - Quality Control Procedure WBNP-QCP-1.8 is being revised to reflect the addition of the retention period of all QCI/QCP attachments which become LOP or DOC documents.

Date When Full Compliance Will Be Achieved

- Item 1 - We are now in full compliance. The additional procedural requirements determined to be needed shall be in effect by July 31, 1980.
- Item 2 - We expect to be in full compliance by August 11, 1980.
- Item 3 - We are in compliance.
- Item 4 - We expect to be in full compliance by August 11, 1980.