

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

June 11, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

Please refer to TVA's letter dated June 5, 1985 which provided responses to various concerns regarding TVA's construction sites.

In the referenced transmittal an error was inadvertently made in our response to concern No. 7, as identified in enclosure 1 to H. L. Thompson's letter to H. G. Parris dated May 16, 1985. Specifically, the word "not" was omitted from the fourth sentence of the first paragraph of our response which should now read ". . . acceptance are not nonconformances." As we discussed yesterday, enclosed is our revised response to concern No. 7.

If you have any questions concerning this matter, please get in touch with R. H. Shell at FTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer

J. A. Domer, Chief
Nuclear Licensing Branch

Sworn to and subscribed before me
this 11th day of June 1985

Paulette H. White
Notary Public
My Commission Expires 8-24-88

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

8506170497 850611
PDR ADOCK 05000390
A PDR

8001
1/1

CONCERN (ENCLOSURE 1 - ITEM 7)

A concern was expressed that the method of identifying NCRs and the use of the Inspection Rejection Notice (IRN) system effectively negated the NCR process. It was submitted this was so because an NCR was only generated when; 1) the equipment/component/system/etc. has been previously inspected and accepted, 2) the records for that inspection were in the vault, and 3) there was a subsequent discovery that something was wrong; however, if there was a problem identified in an initial inspection an IRN is generated.

NRC QUESTIONS PERTAINING TO ABOVE CONCERN (ENCLOSURE 2 - ITEM 6)

With respect to concern 7, is that a proper description of the NCR process? Please verify and certify that reporting of deficiencies meets your licensing commitments and the regulations and that IRNs and NCRs are properly controlled. Is there a master file of IRNs and their resolutions? You may wish to consider having your Quality Technology Company Employee Response Team solicit employee views regarding improper use of the IRN process in lieu of the NCR process.

TVA RESPONSE

(Description of NCR Process)

No, this is not a proper description of the NCR process. The description given in concern 7 depicts a series of events which could create a condition adverse to quality, requiring an NCR, but it is not the description of the NCR process and is one of 13 examples of possible NCRs given in the Watts Bar NCR procedure, WBNP-QCI-1.02. This procedure defines a nonconformance as "a deficiency in characteristic, documentation, or procedure which renders the quality of any item or activity unacceptable or indeterminate. Failed inspections on work in progress before inspector acceptance are not nonconformances." Inspectors are instructed to write NCRs when they encounter a situation which meets the NCR definition, and to write an IRN when the situation meets the IRN definition. The Watts Bar IRN procedure, WBNP-QCI-1.02-1, clearly states that IRNs are prepared only for conditions not considered to be nonconforming.

All IRNs are reviewed by the unit supervisor and an assistant quality manager. These reviews would discover matters which are nonconformances which were recorded on an IRN. Thus the IRN process could not effectively be used to negate the NCR process, either deliberately or by mistake. We have had one instance where an inspector wrote an IRN which should have been an NCR which was not discovered in review. This instance was NRC violation 390/84-84-01, which was closed in NRC report 390/85-23. In this instance, inspection of previously accepted feature was requested in error, and the inspection failed. Neither the inspector nor the supervisor realized the feature had been previously accepted at the time of the second inspection.

IR

At Watts Bar, The Office of Construction has written over 6,000 nonconformances. These have all been reviewed for significance in accordance with our site procedure, WBNP-QCI-1.02, and those found significant forwarded to The Office of Engineering for reportability review. The Watts Bar Procedure meets all licensing commitments and regulations for reporting of deficiencies.

(Master File of IRNs and Their Resolutions)

There is no master file of IRNs. IRNs and status reports are maintained in the individual quality control unit files for a period of sixty days after completion. Open IRNs are carried in the Open IRN Tracking Program until closure. Work sheets for IRNs reviewed for Trend Analysis are kept on file in the Procedures and Training Unit.

(Employee Response Team)

The reporting of NCRs has never been a problem at Watts Bar. Any employee concerns in this area identified during the Employee Response Team interviews will be properly investigated.