

TENNESSEE VALLEY AUTHORITY

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JUL 21 1989

U.S. Nuclear Regulatory Commission
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Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - EVALUATION OF CONDITION ADVERSE TO QUALITY
REPORT (CAQR) PROGRAM

This letter provides the results of our evaluation of concerns raised by the NRC resident inspector and the employee concerns program, as committed in our June 7, 1989 response to violation 390/89-02-01. No programmatic or generic weaknesses were identified in the CAQR program. Specific implementation problems have been identified and they have been documented in our CAQR process. These problems either have been corrected or are currently being corrected.

Delay of this submittal was discussed with Ken Barr on July 17, 1989.

TVA makes no new commitments in this submittal. The discussion below is intended to be informative with regard to current activities in the WBN CAQR program, but does not change or add to commitments previously made. The actions we are now taking meet previous commitments and the approach currently determined to be most appropriate. As activities and priorities change for licensing and operation of WBN, site management may determine that other methods would be more appropriate to meet the requirements of our quality assurance (QA) program and other commitments.

WBN's corrective action program meets the requirements of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action." During the program implementation, problems have been identified at WBN and other sites that included timeliness, potential operability determinations, and the performance of generic reviews. However, no programmatic problems have been discovered to indicate that WBN's corrective action program does not meet regulatory requirements.

Timeliness is not a programmatic issue that requires additional management attention. Approximately 1,626 condition adverse to quality (CAQ) tracking and reporting of open items actions completed January 1, 1989 through June 22, 1989, were reviewed for timeliness at WBN. These actions consisted of the management review of CAQs, the assignments of CAQ/Problem Reporting Document (PRD) numbers by the CAQ coordinator, the determination of significance, development of corrective action, development of recurrence control, and the performance of generic reviews. Over 92 percent of these actions due during this period were completed on time.

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An enhancement to the WBN corrective action program which improves the probability of CAQs receiving the correct offsite potential operability determination was the creation of the Management Review Committee (MRC). An MRC consisting of trained management reviewers from various site organizations was formed at WBN in February 1989 to fulfill the management review responsibilities and to monitor the corrective action process. The MRC currently reviews PRDs/CAQRs at initiation, at corrective action approval, and if invalidated. MRC also reviews revisions to old program CAQs.

CAQRs have been issued which document problems that could have affected the offsite potential operability determination. CAQR WBP 890109 identified PRDs which inappropriately documented indeterminate conditions potentially affecting hardware. The corrective action for this CAQR required a reevaluation of all PRDs for possible upgrading to CAQRs. Approximately half of the PRDs open at the time of establishment of the MRC were upgraded to CAQRs; none were found to affect operability at an operating plant. NRC unresolved item 390/89-02-02 is related to this CAQR. CAQR WBP 890240 documents problem identification reports (PIRs) that should have been documented as CAQRs under the scope of the WBN corrective action program. A review of this CAQR is currently underway by the WBN MRC. Preliminary findings are similar to those for CAQR WBP 890109.

As a result of increased site line management and QA attention given to onsite reviews of generic review requests, only 1 of 68 responses provided to Nuclear Engineering-Engineering Assurance and Nuclear Licensing and Regulatory Affairs since January 1, 1989, has been rejected as inadequate.

WBN Administrative Instruction (AI)-2.8.14 was reviewed by site QA to determine if adequate requirements exist concerning the performance of QA programmatic reviews and generic reviews (report Nos. QWB-M-88-0329 and QWB-88-0328). The reports concluded that AI-2.8.14 contained adequate requirements for the performance of the reviews. WBN AI-2.8.14 requires that CAQs documenting indeterminate conditions be processed as CAQRs, thus ensuring required reviews and approvals are obtained (e.g., operability and generic reviews).

An employee issue that pressure was applied by corporate management to invalidate a CAQR which was valid has been filed at WBN. In addition, two allegations (OSP-88-A-0036 and OSP-88-A-0093) were received on June 20, 1989 from NRC. The first allegation was that employees could not get a CAQR through the system without corporate Quality Assurance approval. The second allegation was that a CAQR identifying a discrepancy was held by a supervisor until the work was completed. These issues are currently being investigated by the Employee Concerns Program.

The most recent audit of the corrective action program (WBA 88826) identified implementation problems with trend analysis of the administrative control programs, a mismatch between the Nuclear Quality Assurance Manual (NQAM) and the Nuclear Components Manual (NCM) regarding handling of ASME Section III CAQs, and a lack of clarity of the design change notice (DCN) CAQ definition. The audit concluded, "With the exceptions noted above, the audit team found the program, its implementation, and the results of the revised process to be fully acceptable."

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Problems have been identified during the implementation of the program, but they have been or are being corrected. Considering actions taken with the above mentioned enhancements, it is TVA's position that the WBN CAQR program is being adequately implemented.

If there are any questions, please telephone G. R. Ashley at (615) 365-8527.

Very truly yours,

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