



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

August 30, 1991

Docket No. 50-390

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

Dear Mr. Nauman:

SUBJECT: WATTS BAR UNIT 1 - QA RECORDS CORRECTIVE ACTION PROGRAM ADDITIONAL
SYSTEMATIC RECORDS REVIEW (TAC NO. 71923)

By letters dated January 28, May 10 and July 2, 1991, TVA provided information on the Additional Systematic Records Review (ASRR).

During a recent Region II team inspection of construction restart activities at Watts Bar, a concern was developed by the team regarding the adequacy of the ASRR. This concern centers around the ability of the ASRR to detect technical deficiencies in Watts Bar records, which are not the result of administrative types of problems such as: data not being filled in, improper changes to the record, or improper use of correction fluid, etc.

As you are aware, the ASRR provides for a dual matrix review of records, based on ANSI type and plant elements (hardware). The review by ANSI record type is well-defined by TVA's submittal, and focuses on review of each record type for six administrative types of attributes: existence, incomplete data, incomplete references/authorization, legibility, referencing, and incorrect changes. The plant element review, on the other hand, is not well defined, and is described as a review "...to assure that the records adequately reflect the installed configuration."

The inspection team conducted a review of several completed workplans (WPs) and maintenance requests (MRs) as a part of the restart inspection. Additionally, the team reviewed TVA's own stop work assessment to determine the types of deficiencies that TVA had identified with WPs and MRs. These reviews noted technical deficiencies in the plant hardware installation from review of the records of the completed work, which would not be found by the administrative type of review discussed above. The team interviewed members of the ASRR staff, and questioned whether the ASRR would identify the types of technical deficiencies which had been noted by the team and by TVA. The conclusion obtained from these interviews was that the ASRR, as currently designed, may not identify all of those types of deficiencies.

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Mr. Dan A. Nauman

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The enclosure to this letter provides a list of specific questions developed by the team. Please respond within 45 days of receipt of this letter.

This requirement affects 9 or fewer respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by

Peter S. Tam, Senior Project Manager
Project Directorate II-4
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Enclosure:
List of Specific
Questions

cc w/enclosure:
See next page

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ENCLOSURE

QUESTIONS CONCERNING TYPES OF DEFICIENCIES WHICH MAY NOT BE ADDRESSED
BY THE ASRR

1. How will the ASRR identify deficiencies in Watts Bar records, which are the result of failure of site procedures to incorporate vendor manual requirements? If not identified in the ASRR, what other CAP, Special Program or other TVA program will identify these deficiencies, and how will the deficiencies be related to the ASRR results?
2. How will the ASRR identify deficiencies in Watts Bar records, which are the result of failure of modifications personnel to follow site procedures, such as: failure to perform megger checks following cable installations, failure to perform procedurally required QC inspections, failure to perform welding or other special processes in the required sequence, failure to determine cable MTR in accordance with procedural requirements, etc? If not identified in the ASRR, what other CAP, Special Program or other TVA program will identify these deficiencies, and how will the deficiencies be related to the ASRR results?
3. How will the ASRR identify material deficiencies, such as: installation of materials which have been procured at the wrong QA level, installation of incorrect size or types of materials, installation of materials with inadequate traceability, installation of materials with inadequate dedication, etc? If not identified in the ASRR, what other CAP, Special Program or other TVA program will identify these deficiencies, and how will the deficiencies be related to the ASRR results?
4. How will the ASRR identify instances where no post-maintenance or post-modification testing (PMT) was performed, or where inadequate PMT was performed? If not identified in the ASRR, what other CAP, Special Program or other TVA program will identify these deficiencies, and how will the deficiencies be related to the ASRR results?
5. How will the ASRR identify records problems such as the problem reported in Notice of Violation 50-390,391/89-13-02, regarding being able to identify inspectors' initials such that there is traceability to the inspectors' qualifications? If not identified in the ASRR, what other CAP, Special Program or other TVA program will identify these deficiencies, and how will the deficiencies be related to the ASRR results?
6. How will the ASRR identify problems, which have been corrected by technical procedure changes due to lessons learned, such as changing the cable pull by criteria from 500 lbs to 400 lbs? If not identified in the ASRR, what other CAP, Special Program or other TVA program will identify these deficiencies, and how will the deficiencies be related to the ASRR results?

Principle Contributor:
R. Gibbs, Region II

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