



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381

OCT 9 1 1991

John H. Garrity
Vice President, Watts Bar Nuclear Plant

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - PLANNED MODIFICATIONS' ACTIVITIES

This is to advise that WBN will be initiating some field work in the near future.

The work we intend to perform may, in some cases, necessitate partial lifting of the WBN Quality Assurance Stop Work Order imposed last December, but will not involve construction work in the sense of the agreement between TVA and the NRC that construction work will not resume without NRC concurrence.

The work we intend to do (which is described in detail in the enclosure) involves maintenance type work and plant cleanup in preparation for future work. Some work is desirable to protect plant equipment, such as application or repair of protective coating, or desirable for worker protection, such as removal of asbestos-bearing insulating material. Some work is simply preparatory to future work, such as removal of old scaffolding and erecting of new scaffolding. In addition, we intend to do minor maintenance-type work such as opening and closing electrical equipment for inspection and repair of minor deficiencies of the "loose, missing and damaged" type. Freeze protection work will also be conducted.

This work will be conducted by the new Modification group including the construction force and inspected by the QC contractor. The work will be governed by revised procedures recently developed, which need a trial run under close observation prior to construction restart. Close management attention and quality monitoring will be provided to check out and refine management quality oversight practices prior to construction restart.

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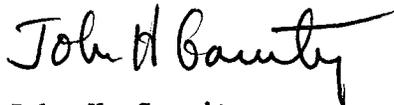
U. S. Nuclear Regulatory Commission

The concept of initiating non-construction work under carefully-monitored conditions was discussed with the NRC in a meeting at Region II headquarters in Atlanta and on March 12, 1991. Following that discussion, a major effort to hi-pot test electrical cables was conducted with very good results. Based on these earlier discussions, the good results of cable test work, the need to accomplish work described, and our conviction that this work can proceed without undue risk, we believe it is prudent to conduct further work as described above.

TVA will notify the NRC Region II staff and the resident inspectors prior to the commencement of the activities described in this enclosure. The TVA staff will be available to discuss individual issues upon request. TVA is expected to begin work by October 15, 1991.

If you have any questions, please telephone P. L. Pace at (615) 365-1824.

Sincerely,



John H. Garrity

cc: NRC Resident Inspector
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ENCLOSURE

WORK TO BE PERFORMED

The work under consideration for Modifications' personnel is as follows:

1. Maintenance requests, work requests/work orders type work to complete the corrective actions on a condition adverse to quality on fire protection hangers. The majority of the work falls under the category of loose, damaged, and missing hardware.
2. Removal of asbestos impregnated cloth from hangers, piping, duct work, and moisture separators. Ninety-five percent of this work is associated with balance of plant equipment. It is appropriate to remove this asbestos prior to bringing in large numbers of craft and to comply with new Federal regulations which go into effect January 1992.
3. Inspect, repair, and replace protective coating and painting of plant floors, walls, and equipment.
4. Protective coating of chilled water piping.
5. Proceed with a clearly identified scope of maintenance requests, work requests/work orders of a simple straight forward nature. This work will not require welding, opening system boundaries, or complicated equipment teardowns. Examples are listed as follows:

MAINTENANCE REQUESTS AND
WORK ORDERS/WORK REQUESTS

WORK DESCRIPTION

A-646052	Missing Junction Box Screws
A-646077	Missing Junction Box Clips
A-646078	Missing Junction Box Gaskets
A-646091	Missing Junction Box Covers
A-646090	Missing Terminal Block Screws
A-646094	Junction Box Clean Up and Touch-Up Paint
A-646093	Repair Junction Holes
A-646095	Install Conduit Identification Labels
A-646092	Mechanical Hanger Spring Nut Misaligned

Any maintenance request, work request, or work order added to this work list will require approval from the Engineering and Modifications manager and the site quality manager. The site resident inspectors will be notified of any additions to this list.

6. Remove existing scaffolding, erect new scaffolding and clean up plant areas.
7. Temporary freeze protection mainly at the intake pumping station where permanent heat trace or freeze protection is out of service.
8. The opening and closing of junction boxes, panels and conduit covers (EQ and non-EQ) to allow inspection and verification of field configurations and to verify constructibility of new designs.