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SEP 30 1992

MEMORANDUM FOR: Gus C. Lainas, Assistant Director
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

FROM: Ellis W. Merschoff, Director
 Division of Reactor Projects, RII

SUBJECT: TIA 92-27 REQUEST FOR TECHNICAL ASSISTANCE - WATTS BAR
 MATERIAL TRACEABILITY

A recent inspection at Watts Bar, documented by inspection report 50-390,391/92-21, resulted in concerns regarding the lack of material traceability, for materials used to fabricate Seismic Category I Supports (for Piping, HVAC, Conduit, Cable Trays, and Instrument lines). The inspection also concluded that cable tray materials, conduit, and some HVAC materials were not traceable. Additionally, some materials such as conduit, anchor bolts, unistrut, rivets, and some HVAC materials have been installed in safety related systems, which were not purchased as safety related. The inspection report should be reviewed for additional detail.

A search of the historical records on this issue identified that, in 1985, TVA's Nuclear Safety Review Staff (NSRS) expressed the following perception concerning material traceability at Watts Bar:

"Material Traceability Very Poor, Especially Seismic Category I Supports (Piping, HVAC, Conduit, Cable Trays, Instrument lines, etc.)"

NSRS staff stated:

"...A much larger and all-inclusive area of traceability breakdown is in the area of Seismic Category I safety related supports. Material for these supports has been traced only to warehouse storage. The material was not traced to the point of installation and use as required by 10 CFR 50, Appendix B, Criteria VIII, and ANSI N45.2."

TVA addressed this perception in the TVA Nuclear Performance Plan, Volume 4, Revision 1, Appendix C by reference to Employee Concerns Subcategory Report 40500. Subcategory Report 40500 identified five concerns regarding lack of traceability for structural materials installed in the plant, as well as, in various storage areas at the plant site. These concerns were consistently evaluated by the Subcategory Report as factual, but not a problem. These evaluations were based on a corporate position on material traceability, which was stated in a letter from S. White (TVA) to H. Denton (NRC) dated March 20, 1986. The enclosure to the letter specifically addressed the area of material traceability for seismic category I supports, and stated that traceability of TVA Level II structural materials to their installed location was not required by TVA's program. The enclosure also concluded that: "TVA's material control

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program meets the requirements of 10 CFR 50, Appendix B, Criterion VIII and ANSI N45.2, section 9." The contents of the portion of the enclosure to TVA's letter concerning material traceability, which provide the TVA corporate position and rationale, are contained in the enclosure to this TIA for your information.

The Region has been unable to find any NRC correspondence which accepts the TVA position stated in the March 20, 1986 letter concerning material traceability.

The Region requests technical assistance in the evaluation of TVA's corporate position concerning compliance with 10 CFR 50, Appendix B, Criterion VIII and ANSI N45.2-1971 at Watts Bar. Additionally, the Region requests an evaluation of the acceptability of the purchase and use of non-safety related materials in the safety related applications noted above.

The requirements for material traceability at Watts Bar were previously discussed in a telephone conversation between Messrs. Gibbs and Barr of Region II, and Messrs. Smith, Mendiola, Zech, Campbell, Spraul, Tam and Potapovs of the NRR staff on July 14, 1992. If you have any questions, your staff may wish to contact R. Gibbs, Watts Bar Project Engineer. Mr. Gibbs can be contacted on FTS: 8-404-331-0341.

(Original signed by J. Johnson)

Ellis W. Merschoff

Enclosure:
TVA Corporate Position
on Material Traceability

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