February 7, 1990

To Dennis Rathbun
From Henry Myers HM

Re: February 5 Answer to January 16 Question IX (I)

The subject response appears to soften or eliminate the 10 CFR 50.55e reporting requirement; i.e. the requirement that the holder of a reactor construction permit must notify the Commission of the discovery of certain construction deficiencies and that such notification must be made within 24 hours of having found a construction deficiency which, were it to have remained uncorrected, could have adversely affected the safe operation of a plant throughout its lifetime.

The subject response raises the following questions:

A. With respect to TVA's actions following its discovery on or about June 16, 1989 of damaged cable at Watts Bar, what NRC review has been conducted that led to the conclusion that TVA did not violate the 50.55(e) reporting requirement?

B. What NRC official determined that no violation of NRC reporting requirements occurred in this matter? If no NRC official made such a determination, what investigation is being conducted to determine whether TVA failed to comply with NRC regulations in this case?

C. What was there about this deficiency that led TVA to conclude that it might not be reportable? What analysis or assessments did TVA make, and/or what information did TVA obtain, between June 16 and August 21 that led TVA to conclude that the event was reportable per 10 CFR 50.55(e)? Please provide a listing of documents which contain any such analyses or assessments and/or additional information.

D. What does NRC staff infer from the fact that a cable removed on suspicion that it might have suffered damage from welding was in fact found to have suffered significant installation damage? [As noted in a previous memorandum, what appears to have occurred here, if TVA is correct in its report on this matter, is that a conduit selected on the basis of an arc strike, contained cable damaged by actions having nothing to do with an arc strike; i.e. the conduit was, in effect, selected at random, and that conduit contained cable damaged during installation. If a conduit selected at random contains cables damaged from improper cable installation techniques, what is the implication vis-a-vis the extent of cable damage resulting from an improper cable installation process at Watts Bar?]

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E. What is the nature and substance of discussions that took place between NRC and TVA staff on this matter during the period between the discovery of the damaged cable by an NRC inspector on July 7, 1989 and the August 21 report to the NRC?

F. With regard to this matter, I have previously requested the following information which appears not to have been taken into account in the answer to Question IX-B:

1. Does ECSP 15100 contain information relating to the employee concern which is not contained in CATD 15100-WBN-01; e.g. additional specifics of the problem, date of receipt of employee concern, TVA entity to which concern was expressed, etc? If ECSP 15100 does not contain such information, what document does do so?

2. What is the relationship between CATD 15100-WBN-01, which contains a description of the proposed corrective action plan (to be carried out per MR #596114 and WP #FB001MB), and the CABLE PULLBACK/REPULL SHEET that refers to Workplan/MR Number A-631256? Were the cables scheduled for pullback and inspection per MR #596114 and WP #FB001MB the same cables scheduled for pullback per Workplan/MR Number A-631256?

3. Why were corrective actions assigned separate corrective action activities, i.e., MR #596114 and WP #FB001MB, one a Maintenance Request and the other a Work Plan for the purpose of conducting the specified cable pull out and inspection activities?

4. How much of the activity specified in MR #596114 and WP #FB001MB was actually conducted in accord with the schedules specified in CATD 15100-WBN-01? [Note: Handwritten notes on CATD 15100-WBN-01 appear to indicate that damage was in fact found during the activities specified in MR #596114 and WP #FB001MB.]

5. In the course of its July 11 and 17 presentations to NRC staff on this matter, did NRC staff discuss any of the matters raised in the foregoing items (F-1 through F-4)? If so, which matters were discussed? Where is any such discussion documented?

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

MAR 02 1990

MEMORANDUM FOR: Dennis K. Rathbun, Director
Congressional Affairs, GPA

FROM: James L. Blaha
Assistant for Operations
Office of the Executive Director for Operations

SUBJECT: QUESTIONS FROM DR. HENRY MYERS

Enclosed are the staff responses to the questions of February 7, 1990 from Dr. Henry Myers. These questions are followup questions to our response of January 16, 1990 (Question IX).

If you have any questions about the responses or attachments, please contact Robert C. Pierson, Assistant Director for TVA Technical Programs, on extension 23312.

James L. Blaha
Assistant for Operations
Office of the Executive Director
for Operations

Enclosure:
Responses to Questions
w/Attachments

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