

TENNESSEE VALLEY AUTHORITY

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JUN 09 1989

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

Gentlemen:

In the Matter of the Application of)
Tennessee Valley Authority) Docket No. 50-391

WATTS BAR NUCLEAR PLANT (WBN) UNIT 2 - SUPPLEMENTAL RESPONSE TO VIOLATION
391/87-03-03, PART 1

Enclosed is our supplemental response addressing NRC's understanding of
commitment implementation provided in K. P. Barr's letter to S. A. White dated
January 26, 1988. The enclosure describes the method of documenting equipment
damage evaluations that are performed when preventive maintenance activities
cannot be completed.

There are no new commitments in this letter.

Our previous responses to this notice of violation referenced units 1 and 2 in
the subject lines and docket numbers. However, the notice of violation and
our responses apply to unit 2 only.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Ralph H. Shell
for
Manager, Nuclear Licensing
and Regulatory Affairs

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission

JUN 09 1989

cc (Enclosure):

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ENCLOSURE

WATTS BAR NUCLEAR PLANT (WBN) UNIT 2
SUPPLEMENTAL RESPONSE TO VIOLATION 391/87-03-03, PART 1

As specified in K. P. Barr's letter to S. A. White dated January 26, 1988, NRC understands that an evaluation is performed when preventive maintenance (PM) activities cannot be completed and any compensatory measures are documented on a discrepancy report (DR). In order to clarify the implementation of our commitment addressing PMs that cannot be completed, the following terms are defined as they apply to the WBN preventive maintenance program:

PM requirement - a test or check completed during performance of a preventive maintenance activity. PM requirements are specified on a PM assignment form, attachment A of WBN-GCI-8.1.01-00, "Preventive Maintenance," (formerly WBN-CEP-1.52) for individual equipment.

PM - a maintenance activity that consists of completing the PM requirements determined to be necessary to prevent equipment degradation.

DR - a deficiency report which documents conditions which prevent equipment from meeting the PM requirements specified on the attachment A. DRs are generated when these conditions are discovered while performing an active PM.

The WBN preventive maintenance program provides two methods for documenting equipment damage evaluations when a PM cannot be performed.

The first documentation method is on a DR. This report is generated when the PM requirements of an active PM cannot be completed. Deficiencies on active PMs are addressed as specified in WBN-GCI-8.1.01-00:

"Deficiencies not closed within 90 days will be escalated by the responsible unit to management attention for additional action. An evaluation of restrained or unrestrained DRs shall be performed to determine detrimental effect on hardware. Interim measures shall be taken and documented on the DR."

The second documentation method is on the appropriate attachment A. This method is used for scheduled suspension of PMs that cannot be performed during a preplanned work activity. Suspended PMs (inactive) are addressed as specified in WBN-GCI-8.1.01-00:

"Prior to suspending PM on any equipment, the ESG [Engineering Surveillance Group] engineer will make an assessment of the effect that PM suspension will have on that equipment or other related systems and document the results on Attachment A. The ESG supervisor or his designee must sign the Attachment A that suspends PM."