

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

85 APR 9 P 1: 3 April 5, 1985

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - SUPPLEMENTAL RESPONSE TO VIOLATION  
50-390/85-01-01 - FAILURE TO COMPLY WITH PROCEDURES DURING CLOSURE OF NCR  
5228

Our response to R. D. Walker's letter dated February 11, 1985,  
report numbers 50-390/85-01, 50-391/85-01 concerning activities at the  
Watts Bar Nuclear Plant which appeared to have been in violation of NRC  
regulations was submitted on March 18, 1985. Enclosed is our supplemental  
response.

If you have any questions concerning this matter, please get in touch with  
R. H. Shell at FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are  
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. A. Damer*  
J. A. Damer  
Nuclear Engineer

Enclosure

cc (Enclosure):

Mr. James Taylor, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
SUPPLEMENTAL RESPONSE TO SEVERITY LEVEL IV VIOLATION  
50-390/85-01-01  
FAILURE TO COMPLY WITH PROCEDURES DURING CLOSURE OF NCR 5228

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, as implemented by the approved quality assurance program (TVA-TR75-1A), requires that activities affecting quality shall be accomplished in accordance with approved instructions, procedures, or drawings.

Contrary to the above, Watts Bar Nuclear Plant (WBN) quality control instruction (QCI) 1.02, "Control of Nonconforming Items," was not complied with during the closure of nonconformance report (NCR) 5228 in that the NCR was closed before all the corrective actions specified by the NCR were completed.

This is a severity level IV violation (supplement II). This violation applies to unit 1 only.

TVA Supplemental Response

During and following meetings onsite between NRC inspectors and site management on February 28 and March 27, 1985, the inspectors cited three apparent examples of NCRs which were improperly handled by TVA personnel. TVA was requested to evaluate the generic implications of the three examples. TVA's comments on the three examples cited and TVA's response to the generic question on "control and handling of nonconforming items by site personnel" are as follows.

NCR 4040R

". . . isolation valves not installed in the preferred shutoff direction . . ." This was the subject of NRC violation 390/84-75-02. TVA in response to this violation stated, "TVA's Office of Engineering (OE) response to construction on nonconformance report (NCR) 4040R was inadequate." Our handling of this NCR was detailed in our response to Region II dated December 19, 1984, on violation 390/84-75-02. Subsequent events, including NRC inspections, have shown that all work specified on engineering change notice (ECN) 4448 and used as the basis for closure of NCR 4040R was not completed in conjunction with the initial implementation of the ECN. Site management concurs that this is an example of an NCR which was improperly closed.

NCR 5612

"Damaged cables" was the subject of NRC violation 390/84-42-01. TVA in response to this violation admitted that the NCR was improperly handled as detailed in our response to Region II dated October 2, 1984. TVA's response and corrective measures on this item were subsequently reviewed by the NRC and violation 390/84-42-01 was closed in NRC inspection report 390/85-01. In response to this item TVA admitted that the overall handling and disposition to this NCR was inappropriate.

NCR 5228

"Cable tray . . . has sustained damage . . . ." This NCR documents damage to the cable tray section which contained the cables documented as damaged on NCR 5612. This was the subject of violation 390/85-01-01. The incident cited in this violation is an example of improper handling of an NCR by site personnel.

TVA believes that the three examples cited are isolated occurrences caused by the extensive extenuating circumstances which were described in our responses to the violations. We do not believe that the disposition and handling of these three NCRs is typical or representative of a significant percentage of the approximately 6000 NCRs issued to date on this project.

Site management continually emphasizes the importance of adhering to procedural requirements in the handling of NCRs. WBNP-QCI-1.02, "Control of Nonconforming Items," was revised four times in 1984 and once in 1985 to refine our control and handling of NCRs. Site personnel who issue and disposition NCRs were trained in each of these revisions. This is in addition to the detailed training administered to initially certify or orient personnel in the application of this procedure. Additionally all NCRs are reviewed and approved by site management at the time of issue and again at the time of disposition and closure. Also the Watts Bar site QA organization reviews each NCR, conducts routine surveillance of the appropriateness of handling on selected NCRs and audits the overall program periodically to ensure compliance.

The small number of problems identified versus the total number of NCRs processed together with our continuing emphasis and surveillance in this area make us confident that we do not have generic problems with the handling of NCRs at this site.