

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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May 9, 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 UNIT 1 - RESPONSE TO VIOLATIONS - 50-390/85-23-01 -  
FAILURE TO RECALIBRATE TEMPERATURE HUMIDITY RECORDERS WITHIN THE SPECIFIED  
INTERVALS AND 50-390/85-23-02 - FAILURE TO ESTABLISH ADEQUATE MEASURES TO  
VERIFY AUTHENTICITY OF CERTIFICATES OF CONFORMANCE

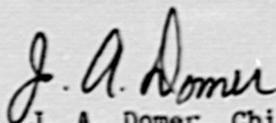
This is response to D. M. Verrelli's letter dated April 11, 1985, report  
numbers 50-390/85-23, 50-391/85-18, concerning activities at the Watts Bar  
Nuclear Plant which appear to have been in violation of NRC regulations.  
Enclosed is our response to the citations.

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. Domer, Chief  
Nuclear Licensing Branch

Enclosure

cc (Enclosure):

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

Records Center  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
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**ENCLOSURE**

**WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO SEVERITY LEVEL V VIOLATIONS  
50-390/85-23-01  
FAILURE TO RECALIBRATE TEMPERATURE HUMIDITY  
RECORDERS WITHIN THE SPECIFIED INTERVALS**

**Description of Deficiency**

10 CFR 50, Appendix B, Criterion V states that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of the type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. The licensee's accepted Quality Assurance (QA) Program (TVA-TR75-1A), Table 17D-3, endorses Regulatory Guide 1.38 and ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants." Technical Instruction TI-10 implements the requirement to adjust and calibrate measuring equipment at prescribed intervals.

Contrary to the above, a temperature humidity recorder in warehouse hut IV and another in warehouse hut V were past due for calibration required by TI-10.

**Response**

**1. Admission or Denial of the Alleged Violation**

TVA admits the violation occurred as stated.

**2. Reasons for the Violation**

The deficient instrumentation was inadvertently left from the inspection and calibration program as defined in Support Services Section Letter M-5, and therefore notification of the recalibration due date was not scheduled.

**3. Corrective Actions Taken and the Results Achieved**

The instrumentation with deficient due dates was replaced with properly calibrated instruments. Evaluation of outside temperature chart recorder data during the period these instruments were out of calibration showed the temperature range to be 50-80 degrees fahrenheit. Since the maximum allowable temperature for the storage areas where these instruments are used is 120 degrees fahrenheit, the instruments could have been as much as 50 percent off and still would have been acceptable. The as-found out-of-tolerance values were 20 percent. Therefore, TVA concludes that the temperature for these storage areas was in conformance during the time the subject instruments were used and no further corrective action on stored materials is required.

4. Corrective Action Taken to Avoid Further Violations

The material and test equipment calibration records were reviewed by the Site Services group to ensure that all the Power Stores assigned equipment is now included in the program as defined in Support Services Section Letter M-5. The calibration due date is now being verified each time the recorder chart paper is changed.

5. Date When Full Compliance Will Be Achieved

TVA is now in full compliance.

**WATTS BAR NUCLEAR PLANT UNIT 1  
RESPONSE TO SEVERITY LEVEL V VIOLATION  
50-390/85-23-02  
FAILURE TO ESTABLISH ADEQUATE MEASURES TO VERIFY  
AUTHENTICITY OF CERTIFICATES OF CONFORMANCE**

**Description of Deficiency**

10 CFR 50, Appendix B, Criterion VII, requires establishing measures to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. The licensee's accepted Quality Assurance (QA) Program (TVA-TR75-1A), Table 17D-3, endorses Regulatory Guide 1.123 and ANSI N45.2.13-1976, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants." Paragraph 10.2(f) of this standard requires providing a means to verify the validity of supplier's certificates and the effectiveness of the certificate system.

Contrary to the above, measures have not been established to verify the authenticity of Certificates of Conformance (COC) in that the person authorized to attest to the certificate was not identified in requisition 357883.

**Response**

**Admission or Denial of the Alleged Violation**

TVA does not agree that a violation of ANSI N45.2.13 occurred as stated.

We do not concur that ANSI N45.2.13 requires a means to verify the authenticity of COC during receipt inspection by the comparison of the signature on the COC against a preestablished list of persons authorized to sign COCs.

Paragraph 10.2d of this standard requires that the responsible person's function and position be described in the purchaser's or supplier's quality assurance program. Paragraph 10.2e requires the certification system including procedures for review and approval of the certificates, shall be described in the purchaser's or supplier's quality assurance program. Paragraph 10.2f requires the purchaser to verify the validity of supplier certification and the effectiveness of the certification system, such as during the performance of audits of the supplier.

TVA's QA program requires that the supplier submit a description of his certification program, including names and positions of those authorized to sign COCs, only if the contract does not require that the supplier have a TVA-accepted QA program. When a TVA-accepted QA program is required, we assure through program review and/or audit that the supplier's certification program is adequately effective to ensure valid COCs. This satisfies the requirements of ANSI N45.2.13.

Contract 85PW7-357883, the example cited by the NRC inspector for the violation, required that Raychem have a QA program. It was required that this QA program cover the supplier's certification program and specifically stated in the contract that, "The supplier shall maintain a method of acceptance of the items being furnished. Prior to offering the item for acceptance to TVA, the supplier shall verify that the item being furnished complies with the procurement document requirements. Documentary evidence that items conform to procurement documents shall be forwarded along with the shipment of the items."

TVA audited Raychem on November 28-29, 1984 to verify adequate implementation of their QA program. Acceptance of Raychem's QA program provided TVA with adequate assurance about the "validity of supplier certification and the effectiveness of the certification system."