

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

82 AUG 26 AID : 41

August 25, 1982

U.S. Nuclear Regulatory Commission

Region II

Attn: Mr. James P. O'Reilly, Regional Administrator

101 Marietta Street, Suite 3100

Atlanta, Georgia 30303

Dear Mr. O'Reilly:

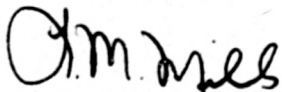
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC REGION II REPORT 50-390/82-18
AND 50-391/82-15 - ADDITIONAL RESPONSE TO VIOLATIONS

The subject letter dated July 7, 1982 cited TVA with three violations. TVA's final response to violation 50-390/82-18-01 and 50-391/82-15-01 and an interim report on violation 50-390/82-18-03 and 50-391/82-15-03 were provided on August 20, 1982. As discussed with Inspector D. Quick on August 24, 1982, the enclosed response to violation 50-390/82-18-05 and 50-391/82-15-06 was inadvertently omitted from our August 20, 1982 letter.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Licensing

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 RESPONSE TO VIOLATION 50-390/82-18-05 AND 50-391/82-15-06

Severity Level IV Violation 50-390/82-18-05, 50-391/82-15-06

A. 10 CFR 50, Appendix B, Criterion XVIII requires a system of audits be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. The audits must be performed by appropriately trained personnel. The accepted QA program, FSAR section 17.1A commits to safety guide 28 which endorses ANSI N45.2-1971. Section 6 of this standard, contains the same requirements as does Criterion XVIII of Appendix B.

1. Contrary to the above, the corrective action portion of audit OPQAA-WB-SP-01 did not verify compliance of corrective action procedures for design deficiencies, nonconforming items in procurement, procedural deficiencies, or drawing discrepancies.
2. Contrary to the above, the maintenance portion of audit OPQAA-WBSF-01 was not performed by an auditor trained in accordance with ID-QAP-18-1 a licensee prescribed instruction.

A1. Admission or Denial of the Alleged Violation

TVA admits that, as stated, audit WB-82SP-01 did not verify all aspects of the plant corrective action program. TVA denies, however, that the scope or method of the audit violates the requirements of Criterion XVIII of Appendix B or Section 19 of ANSI N45.2-1971. (Section 6 of ANSI.2-1971 was quoted in the inspection report--apparently in error.)

Criterion XVIII of Appendix B (and Section 19 of ANSI N45.2-1971) requires that: "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program." TVA has such a system of audits for the Watts Bar Nuclear Plant but has not and does not attempt to verify all aspects of a specific area such as corrective action in each schedule audit. Rather, the objective is to selectively include certain aspects in a particular audit with other aspects to be covered in subsequent audits in the series so that the entire range is covered over a reasonable period of time. TVA believes that this approach is consistent with the intent of Appendix B as well as with audit practice throughout the industry.

TVA recognizes that there had been a lapse in the audit program for the activities of the Nuclear Power Division at WBN due to manpower shortages and postponement of the fuel loading date. The audit schedule has now been brought up to date and future audits will be conducted in accordance with the published schedule.

A2. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation If Admitted

The violation occurred because of an oversight which resulted in a technical specialist being treated as an auditor during the maintenance portion of the audit.

Corrective Steps Which Have Been Taken and the Results Achieved

An audit of maintenance activities has been scheduled for September 1982 and will be conducted by a fully qualified audit team.

Corrective Steps Which Will Be Taken to Avoid Further Violations

All operational audit team personnel have been instructed on the requirements regarding the use of technical specialists and the procedures which are to be followed for documenting compliance with these requirements.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved after completion of the maintenance audit scheduled for September 1982.