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ATLANTA
TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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October 22, 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 UNIT 1 - NRC-OIE REGION II INSPECTION REPORT
50-390/82-17, 50-390-82-14 - REVISED RESPONSE TO VIOLATION

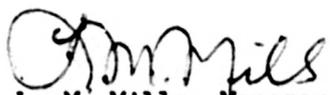
The subject report dated June 4, 1982 cited TVA with one Severity Level V Violation in accordance with 10 CFR 2.201. Our response to that violation was submitted on July 15, 1982. Enclosed is our revised response.

As discussed briefly with Inspector H. Dance on September 29, 1982, this revision is to change the method TVA will use to specify which locking devices will be inspected (i.e., physical area search versus records search), to change the date of full compliance, and to delete the reference to the unit 2 completion date which was included in error (the violation only pertains to unit 1).

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, D.C. 20555

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1 REVISED RESPONSE TO VIOLATION

Violation 50-390/82-17-01

10 CFR 50, Appendix B, Criterion XVI, as implemented by Section 17.1A.16 of the Watts Bar FSAR requires that "Measures shall be established to assure that conditions adverse to quality, such as . . . are promptly identified and corrected." Corrective action described in TVA's response of January 25, 1982, to enforcement action on loose jam nuts observed on finalized hangers, 390/81-19-02, including reinspections of accepted hangers, oral and written instructions, training and procedural revisions.

Contrary to the above, on April 30, 1982, adequate measures had not been taken to assure that certain conditions adverse to quality were promptly identified and corrected in that two previously accepted safety-related pipe hangers 62-1CVC-R69 and 62-1CVC-R76 were found with loose jam nuts. Moreover, the licensee provided no objective documented evidence to verify that corrective actions implemented as a result of violation 390/81-19-02 produced the confidence level needed to assure that hanger installations finalized prior to the date of the above violation were now acceptable.

This is a Severity Level V Violation (Supplement II.E).

Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

Reason for this Violation

This violation was caused by TVA's belief that the results of the jam nut sampling program, as discussed in our response to violation 390/81-19-02, did not indicate that a check of previously accepted jam nuts was necessary. Therefore, TVA did not take any further corrective actions in that area. Our corrective actions were subsequently reviewed by NRC and discussed in Inspection Report 50-390/82-10, 50-391/82-08 in which it was stated, ". . . TVA had determined the full extent of the subject violation, performed the necessary follow-up actions to correct the present conditions, and developed the necessary corrective actions to preclude recurrence of similar circumstances."

Corrective Steps Taken and Results Achieved

In response to NRC Violation 390/81-19-02 involving loose jam nuts, the Hanger Engineering Unit began using torque stripping on threaded devices as a means to prevent recurrence of this problem. The seismic supports identified in this violation were inspected before the use of torque stripping.

To prevent recurrence of this problem, a reinspection of all supports utilizing similar locking devices will be conducted by an area concept. This is to say that all installed supports not marked with torque stripping will be reinspected on a room by room basis, and will have torque stripping applied upon completion of each inspection. Supports found to have loose jam nuts will be documented on NCR 4105R and will have their inspection records updated to so indicate. All hangers in unit 2 were previously scheduled to have torque stripping applied by the program already in place at WBN.

This revision to corrective steps is a more expedient method to handle the reinspection effort. The comparison of inspection records to drawings in search of supports utilizing locking devices was deemed to be inefficient and was retarding the reinspection process.

During the week of May 17, 1982, the Construction Quality Assurance team conducted an audit (WB-M-82-04) to verify the effectiveness of torque stripping. Of the supports inspected with torque stripping applied, there was no evidence of tampering. Based on this audit, WBN has obtained the confidence level needed to assure that hanger installations before this violation will be acceptable.

Corrective Action Taken to Avoid Further Violations

The 1982 Quality Action Plan was implemented early this year which placed special emphasis on developing and implementing effective corrective actions on recognized deficiencies. TVA believes the added emphasis provided by this action plan will prevent this type of violation from recurring.

Date of Full Compliance

TVA expects completion for unit 1 and common by January 30, 1983.