

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

October 13, 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 INSPECTION REPORT
50-390/82-18 AND 50-391/82-15 - REVISED RESPONSE TO PART 1 OF VIOLATION
50-390/82-18-05, 50-391/82-15-04

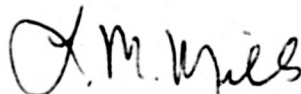
The subject letter dated July 7, 1982 cited TVA with three violations. TVA's response to violation 50-390/82-18-05 and 50-391/82-15-04 was provided on August 25, 1982. Discussions with Inspectors D. Quick and T. Heatherly on September 23, 1982 have resulted in TVA revising its response to part 1 of that violation. Enclosure 1 is our revised response. Enclosure 2 is a tentative schedule of planned audits which Mr. Quick requested during the above discussion.

If you have any questions, 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



L. M. Mills, Manager
Nuclear Licensing

Enclosures

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

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 REVISED RESPONSE TO PART 1 OF VIOLATION 50-390/82-18-05 AND 50-391/82-15-04

Severity Level IV Violation 50-390/82-18-05, 50-391/82-15-04

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 N45.21971. 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-WBSP-01 was not performed by an auditor trained in accordance with ID-QAP-18-1 a licensee prescribed instruction.

TVA Response to Part 1

Admission or Denial of the Alleged Violation

TVA admits that, as stated, audit WL-82SP-01 did not verify all aspects of the plant corrective action program and admits that the methods employed during this audit did not meet the requirements of Criterion XVIII of 10 CFR 50, Appendix B, and Section 19 of ANSI N45.2-1971. TVA denies, however, that the scope of the audit was in violation of the above-referenced requirements.

Criterion XVIII of 10 CFR 50, Appendix B, and Section 19 of ANSI N45.2-1971 require that "a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance 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 scheduled audit. Specifically, related corrective action areas identified in the subject inspection report (design deficiencies, nonconforming items, procedural deficiencies, and drawing discrepancies) are audited during audits of preoperational testing; turnover activities; modifications; nonconforming materials, parts, and components; instructions, procedures, and drawings; and document control. The objective of this approach is to selectively include certain aspects in a particular audit with other aspects to be covered in subsequent audits so that the entire range is covered over a reasonable period of time. TVA believes that this approach is consistent with the intent of 10 CFR 50, Appendix B as well as with audit practice throughout the industry.

The Reasons for the Violation

The methods employed during the audit were in violation of 10 CFR 50, Appendix B, and ANSI N45.2 requirements because sufficient time was not given for preparing and conducting the audit. This occurred because of inadequate manpower in the operational audit section.

Corrective Steps Which Have Been Taken and the Results Achieved

The operational audit schedule is being revised to defer or cancel necessary but nonessential audits that are not specifically required by current commitments. This action will allow for adequate time to be allocated for the preparation and conduct of essential audits.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The TVA quality assurance program is currently undergoing an extensive reorganization. One of the objectives of this reorganization is to increase operational audit resources and effectiveness by placing resident quality assurance auditors at the plant sites for more detailed coverage of plant activities.

The Date When Full Compliance Will Be Achieved

TVA is now in full compliance by deferring nonessential audits and will staff the Watts Bar resident auditor positions by March 1983.

ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
TENTATIVE OPERATIONAL AUDIT SCHEDULE

Turnover Activities

- completed August 10, 1982
- first quarter 1983
- third quarter 1983

Preoperational Testing

- completed May 13, 1982
- fourth quarter 1982
- second quarter 1983
- fourth quarter 1983

Design Modifications

- fourth quarter 1982
- second quarter 1983
- fourth quarter 1983
- second quarter 1984

Document Control/Instruction, Procedures, and Drawings

- fourth quarter 1983

Corrective Actions Program

- fourth quarter 1983

Nonconformance of Material Parts and Components

- fourth quarter 1983 (Plant)
- first quarter 1984 (Stores)