TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

August 26, 1981

WBRD-50-390/81-23
WBRD-50-391/81-22

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - DISCREPANCY IN AS-BUILT VERSUS AS-ANALYZED PIPING SYSTEMS - WBRD-50-390/81-23, WBRD-50-391/81-22 - SECOND INTERIM REPORT

The subject deficiency was initially reported to NRC-OIE Inspector R. V. Crlenjak on February 26, 1981, in accordance with 10 CFR 50.55(e) as NCR WBN SWP 8108. Our first interim report was submitted on March 30, 1981. NCR WBN SWP 8148 was reported to NRC-OIE Inspector R. V. Crlenjak on April 29, 1981. Mr. Crlenjak was informed that NCR WBN SWP 8148 would be reported with NCR WBN SWP 8108 as WBRD-50-390/81-23 and WBRD-50-391/81-22.

Enclosed is our second interim report covering both these NCR's. We expect to provide additional information by May 22, 1982.

If you have any questions, please get in touch with D. L. Lambert at FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure
cc: Mr. Victor Stello, Director (Enclosurs)
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
DISCREPANCIES IN AS-BUILT VERSUS AS-ANALYZED PIPING SYSTEMS
WBRD-50-390/81-23, WBRD-50-391/81-22
10 CFR 50.55(e)
SECOND INTERIM REPORT

## Description of Deficiency

### NCR WBN SWP 8108

During the evolution of the pipe support design effort, inconsistencies have developed between the support locations as specified on the support drawings and the analysis isometrics. These discrepancies came about due to a failure to revise the isometric drawings when field changes were made. The support drawings are used for installation while the isometric drawings are used during field inspections to verify support node locations. Construction specifications allow an acceptable relocation tolerance from the analyzed point; however, some supports have been determined to be outside this acceptance tolerance.

### NCR WBN SWP 8148

During the pipe support design effort, the designer may have used part of the acceptable relocation tolerance. TVA's Division of Engineering Design (EN DES) employees have erroneously told TVA's Division of Construction (CONST) to apply the full relocation tolerance from the locations shown on the support drawing; therefore, some supports may be installed outside the acceptance tolerance from the analysis point.

## Corrective Action

Discrepancies between as-built and as-analyzed support locations will be evaluated for impact on the seismic analysis. The method of resolving these discrepancies will be the determination of the location of all "installed" supports and evaluating or reanalyzing as required to qualify the installed condition. This effort is covered by Report CEB-81-30, "Program Plan - Field Inspection for Determination of As-Constructed Pipe Configuration and Location of Pipe Supports on Rigorously Analyzed Piping Systems." Any discrepancies described by NCR WBNSWP8108 involving supports that are not installed will be resolved by revising the support drawing location by field change request. Analysis isometrics will be revised to depict the installed conditions.