

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

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December 19, 1984

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-390/84-77, 50-391/84-54 - RESPONSE TO VIOLATION

The subject inspection report cited TVA with a Severity Level V Violation (390/84-77-01) in accordance with 10 CFR 2.201. Enclosed is our response to the subject violation.

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

J. A. Domer

J. A. Domer
Nuclear Engineer

Enclosure

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

Records Center (Enclosure)
Institute of Nuclear Power Operations
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Atlanta, Georgia 30339

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1

NRC-OIE REGION II INSPECTION REPORT

50-390/84-77 AND 50-391/84-54

Response To Violation

Severity Level V Violation - 390/84-77-01

10 CFR 50, Appendix B, Criterion V as implemented by TVA's QA Topical Report TVA-TR75-1A Revision 7, paragraph 17.2.5, requires that activities affecting quality be accomplished in accordance with documented procedures.

Administrative Instruction (AI)-6.2 "Preoperational Test Program", R2 requires that "Following an interruption extending into the next working shift, the test director shall determine the validity of all plant conditions pertaining to the test before re-initiating performance. The shift engineer shall be notified to determine if system alignments and/or operations need to be repeated and that plant conditions are such that the test can be resumed. The shift engineer may review his journal and other pertinent information in reaching this determination. The test director will document in his test log that such a review has been completed and the actions that have been taken as a result of this review."

Contrary to the above, activities affecting quality were not accomplished in accordance with AI-6.2 in that required test log entries were not made by test directors prior to resuming testing following test interruptions extending into the next working shift for test procedure TVA-29 from May 18, 1984, to September 25, 1984; and test procedure TVA-41 from July 20, 1984, to August 17, 1984.

Admission or Denial of Violation

TVA agrees with the violation as stated.

Reason for the Violation

The preoperational test engineers conducting tests TVA-41 and TVA-29 were knowledgeable of the requirements to determine the validity of all plant conditions pertaining to the tests before re-initiating performance, following a test interruption extending into the next working shift. However, the test engineers were not fully aware of the requirements to document this review in the test log. This requirement, as defined in AI-6.2, was not clearly understood by the test engineers.

Corrective Steps Which Have Been Taken and the Results Achieved

Immediately upon identification of the problem by the NRC Inspector, the Preop Section Supervisor issued a letter to all section personnel identifying the requirements to make a log entry when plant conditions were verified acceptable to continue testing, after a break in test performance that extends into the next working shift.

Corrective Steps Taken to Avoid Further Violations

This requirement is now part of the Preop Section periodic training program and will continue to be emphasized by section management.

Date When Full Compliance Will Be Achieved

Watts Bar is now in full compliance.