

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

85 FEB 4 12:58 February 1, 1985

WBRD-50-390/85-02
WBRD-50-391/85-01

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 - INCOMPLETE COMMITMENTS TO NRC
- WBRD-50-390/85-02, WBRD-50-391/85-01 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector Al Ignatonis on December 14, 1985 in accordance with 10 CFR 50.55(e) as NCR WBN NEB 8419. Enclosed is our final report. A several week delay of this submittal was discussed with Inspector Ignatonis on January 14, 1985.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Damer
for J. W. Hufham, Manager
Licensing and Regulations

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
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ENCLOSURE
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
INCOMPLETE COMMITMENTS TO NRC
NCR WBN NEB 8419
WBRD-50-390/85-02 AND WBRD-50-391/85-01
10 CFR 50.55(e)
FINAL REPORT

Description of Deficiency

Recent reviews conducted by TVA and NRC on the implementation of commitments made by TVA to the NRC as documented on Office of Engineering (OE) commitment tracking records (CTRs) have identified problems in verifying that the commitment to NRC has been successfully implemented. Based on specific situations identified, areas of immediate concern include implementation of main control room "human factors" changes (reference Appendix D to the Watts Bar Safety Evaluation Report (SER)), protection of safe shutdown circuits inside containment for compliance with 10 CFR 50, Appendix R, and essential raw cooling water (ERCW) pump and pump motor modifications as reported to NRC under 10 CFR 50.55(e).

While CTRs are not design input or output documents as defined by TVA's quality assurance program; they are tracking documents used by OE and the Office of Construction (OC). The CTR restates commitments made by TVA to NRC in 10 CFR 50.55(e) reports, FSAR question responses, meetings, etc., to accomplish future work by specific dates or milestones. The CTR is issued to the organization(s) responsible for implementing the commitment. When the applicable documentation (memorandums, engineering change notices (ECNs), procedures, workplan, etc.) issued to implement the commitment is identified as being complete by the responsible organization, the CTR is closed. Also, when the CTR identifies work to be accomplished by TVA's Office of Nuclear Power (NUC PR), the CTR is submitted to NUC PR and subsequently closed after NUC PR acknowledges that the commitment has been placed in their tracking system.

CTR closure has been interpreted as TVA's successful implementation of the commitment made to NRC. In the areas of concern identified above, the following problems were noted.

1. TVA had reported to NRC that a substantial number of the "human factors" changes as described in Appendix D to the Watts Bar SER had been completed. This report was based on closure of the CTRs that described the commitments and implementing documents. Subsequent reviews of this work by TVA and NRC noted that a number of the modifications reported as complete required additional work on the part of TVA to finish the changes.
2. A request was received to close a CTR describing a commitment to NRC for providing an analysis on protection of safe shutdown circuits inside primary containment to comply with 10 CFR 50, Appendix R. However, this request was based on cancellation of the implementing document (i.e.,

ECN) not on completion of the commitment. As such, CTR closure would have been inappropriate since the commitment to NRC had not been implemented yet.

3. Commitments for corrective action to resolve two ERCW pump concerns reported under 10 CFR 50.55(e) were documented in final reports to NRC-Region II. The commitments were restated on CTRs and transferred to NUC PR for implementation. However, TVA decided to pursue corrective actions for these problems different from that stated in the 10 CFR 50.55(e) reports and CTRs. However, before a revised 10 CFR 50.55(e) report was submitted to NRC describing the revised corrective actions, an NRC inspector expressed a concern that the specific corrective actions committed to NRC in the 50.55(e) reports are not being implemented, thereby leaving the impression that TVA was not meeting its commitments.

The assignable cause for this condition can be defined in three basic problem areas:

1. Inadequate understanding, definition, and documentation of the scope of work required to successfully implement commitments.
2. Inadequate procedural/administrative guidance on documenting the status of commitment completion.
3. Inadequate controls to assure that commitments made to NRC are maintained.

Safety Implications

In general, TVA believes that the failure to accurately track and implement commitments made to NRC by TVA could result in the committed actions being revised (or possibly discontinued) without a proper evaluation being performed (by TVA or by NRC) on the effect such a change could have on the accuracy and completeness of the plant's design, safety analysis, procedures, etc. As such, the situations described above are representative of a programmatic condition which TVA believes has the potential to adversely affect safe operations of the plant.

Corrective Action

To resolve the concerns related to main control room human factors modifications, TVA is presently working to reverify the status of implementation of the WBN SER, Appendix D, commitments. Specific actions being taken as part of this effort include:

1. Determination of the detailed work scope required to comply with the commitments in Appendix D to the WBN SER.
2. Verification by OC and NUC PR that the work scope has been successfully implemented.
3. Reverification of the implemented changes by the WBN Control Room Design Review team.

The additional items documented by this nonconformance involve areas where the requirements for documenting commitment completion or revising commitments were not clearly defined and, in some instances, CTR closure (due to the administrative transfer of the commitment to another system for tracking purposes) was misinterpreted as commitment completion. To address this concern, additional guidance (either procedural or tutorial) will be issued to specify the requirements for closure of commitments made by OE and OC. As part of this guidance, commitments made by OE/OC for plants still under construction that are to be implemented by NUC PR will remain open in OE's commitment tracking system until the work is complete.

In addition, TVA (OE-NEB) will issue a special engineering procedure (SEP) to initiate a separate review of selected WBN commitments as documented on CTRs to provide additional assurance that the work committed to by TVA was implemented.

The above stated actions will be complete by February 15, 1985.

To prevent recurrence of this condition, the following actions are to be taken:

1. Future commitments made to NRC on plants still under construction will be assigned to a responsible organization for identification of actions required for commitment compliance. The responsible organization must develop a work scope, actions for implementation, and milestones for completion. The required actions and milestones will be entered into the Tracking and Reporting of Open Items (TROI) system and followed to completion of the individual actions. This revision to our commitment tracking process will be fully implemented by February 28, 1985.
2. OE's quality assurance organization will include implementation of commitments to NRC as an item for future audit and surveillance activities.
3. Presently, design changes implemented by ECN are not specifically reviewed against CTR-level commitments to ensure that the proposed changes do not modify a previous commitment to NRC. ECN preparers and reviewers will be issued guidance by February 28, 1985, to consider any prior commitments made to NRC during the issuance of ECNs. To supplement this effort, all CTR-level commitments will be identified by project to the design organizations. This work will be accomplished by April 1, 1985. Additional actions for controlling these reviews will be considered based on the result of the SEP review noted above.
4. TVA's Nuclear Quality Assurance Manual (NQAM), Part V, Section 16.2 (previously ID-QAP-16.2), "Control and Tracking of Licensing Commitments by OE and OC" does not presently describe responsibilities for controlling commitments transferred by OE or OC to NUC PR for implementation. This additional commitment control interface will be addressed in the next revision to this procedure no later than May 1, 1985.