

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

January 18, 1985

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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 UNIT 1 - RESPONSE TO VIOLATION 390/84-84-01 - FAILURE TO
DOCUMENT A NONCONFORMANCE

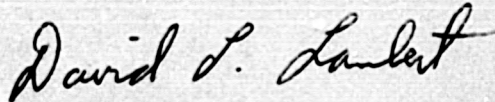
This is in response to D. M. Verrelli's letter dated December 18, 1984, report
number 390/84-84 concerning activities at the Watts Bar Nuclear Plant which
appeared to have been in violation of NRC regulations. Enclosed is our response
to the citation.

If you have any questions concerning this matter, 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



D. L. Lambert
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
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1
SEVERITY LEVEL V VIOLATION 390/84-84-01
DATED DECEMBER 18, 1984
FAILURE TO DOCUMENT A NONCONFORMANCE

Description of Deficiency

10 CFR 50.54(a)(1) requires Tennessee Valley Authority (TVA) to implement the quality assurance (QA) program described or referenced in its Safety Analysis Report Section 17.1.5 of the TVA QA program, which requires that documented instructions be followed for all activities affecting quality. Watts Bar Nuclear Plant (WBN) quality control instruction (QCI) 1.02 requires documentation of nonconformances.

Contrary to the above, the following example of failure to document a nonconformance was identified. The procedure for inspection rejection notices (IRN) requires that an IRN be closed by a satisfactory reinspection or the issuance of a nonconforming condition report. IRNs E-ABN-93 and 95 were voided instead of issuing a nonconformance report.

TVA Response

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

The support discrepancies documented on the identified IRNs had been previously inspected and accepted. However, the program under which the supports had been inspected had been revised. (All work performed under the previous program is acceptable.) The program previously in effect employed a method of traceability to identify supports which is no longer used. For this reason, quality control personnel trained only in the current program did not recognize that these supports had been previously documented as acceptable and initiated the IRNs to document the condition. When Construction Engineering personnel identified that the conduit supports had been previously inspected and accepted, the IRNs were returned to quality control and were subsequently improperly dispositioned.

Corrective Steps Taken and Results Achieved

A nonconforming condition report has been written to document and disposition this deficiency. To date, all improperly dispositioned IRNs have been reviewed to determine the acceptability of the features involved. This review, to date, has identified 158 IRNs which documented repeated inspections performed on previously accepted features. Of these, 135 were closed with no additional action required. The features documented on the remaining 23 required reinspection and/or rework.

Corrective Steps Taken to Avoid Further Violations

The construction engineer and the quality manager have issued written instructions to all unit supervisors which read as follows:

"The subject violation cites examples of the improper disposition of IRNs in that IRNs were voided. There is no provision in the governing procedure, QCI-1.02-1, for voiding IRNs. The disposition of an IRN must proceed to either the closure of the IRN or to the issuance of a nonconforming condition report as appropriate. Please remind all personnel under your supervision who issue, review, or disposition IRNs of this requirement. Initiate training in QCI-1.02-1, "Inspection Rejection Notice," if required."

This will preclude recurrence of this deficiency.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance by January 30, 1985.