

Page 2

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WBNP-QP-1.12 has been revised to incorporate the "Out of Tolerance Condition Report" and a "Lost Property Report." The responsible engineering unit supervisor is now required to evaluate these reports and return them to the CCF within 14 days of receipt. The implementation of the Construction Requirements Manual which indexes upper tier requirements and implementing procedures should preclude omissions of this type in the future.

Page 2

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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

March 16, 1982

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WBRD-50-390/81-95  
WBRD-50-391/81-89

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 - DOCUMENTATION OF INVESTIGATION OF  
USE OF EQUIPMENT FOUND OUT OF CALIBRATION - WBRD-50-390/81-95,  
WBRD-50-391/81-89 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector  
R. V. Crlenjak on November 6, 1981 in accordance with 10 CFR 50.55(e)  
as NCR M81-11, Deficiency 1. An interim report was submitted on  
December 7, 1981. Enclosed is our final report.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)  
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  
DOCUMENTATION OF INVESTIGATION OF USE OF EQUIPMENT FOUND OUT OF CALIBRATION  
WBRD-50-390/81-95, WBRD-50-391/81-89  
10 CFR 50.55(e)  
FINAL REPORT

### Description of Deficiency

The TVA OEDC QA manual for ASME Section III, Nuclear Power Plant Components (NCM), requires that in the event an instrument is found out of calibration, all work checked with the instrument since the previous valid calibration shall be considered unacceptable and shall be rechecked unless it can be determined that all applicable requirements have been met. Contrary to the above requirement, the performance of activities described in the site implementing procedure, WBNP-QCP-1.12 (Control and Calibration of Construction Tools, Instruments, and Measuring Devices) is not being documented. A form does not exist in QCP-1.12 to document investigation of the usage of measuring and test equipment found out of tolerance (calibration).

The root cause of this deficiency lies in the evolution of the methods for handling measuring and test equipment at the Watts Bar site. Originally, this equipment was calibrated at TVA's Central Laboratories in Chattanooga. The "Out of Tolerance Condition Report" and the "Lost Property Report" was initiated by the Central Lab and the investigation of the usage of out of tolerance measuring and test equipment was documented by memorandum. Later, when measuring and test equipment was calibrated onsite, the use of the Central Lab form was continued as was the documentation by memorandum. However, the form was not incorporated into the controlling procedure, WBNP-QCP-1.12.

### Safety Implications

The method used to evaluate and document out of tolerance test equipment and activities verified with this equipment constitutes an inconsistency in procedural requirements in that the form in use was not an attachment to the procedure. This had no bearing whatever on the validity of the evaluation performed by the supervisor. However, if no record of rechecking instruments can be found, then the validity of the original equipment checks or tests remains questionable. This condition could adversely affect the safety of operations of the plant.

### Corrective Action

TVA's further investigation into this deficiency has revealed that, although not a part of WBNP-QCP-1.12, usage of measuring and test equipment found out of tolerance had been documented by use of the "Out of Tolerance Condition Evaluation Report" and by memorandum. There were several engineering disciplines that had responsibility for their own calibration and record keeping. TVA has now formed a Central Calibration Facility (CCF) at the Watts Bar site.