

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

October 14, 1982

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US NRC REGION II
ATLANTA, GEORGIA

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 - NRC-OIE REGION II INSPECTION REPORT
50-390/82-27, 50-391/82-24 - RESPONSE TO DEVIATIONS

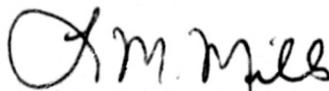
The subject inspection report cited TVA with two deviations. Enclosed is our response to those deviations. TVA will provide further information by November 30, 1982 concerning our actions to prevent occurrence of a situation similar to those cited in the deviation. This further information will also address the concerns expressed in the inspection report transmittal letter.

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 to be complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Licensing

Enclosure

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

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO DEVIATIONS

Deviations A and B

Description A - Deviation 50-390/82-27-05, 50-391/82-24-05

In response to a Region II letter dated May 30, 1982, the licensee committed in its letter dated June 25, 1982, to corrective actions such that safety related cables would be 100 percent inspected by signal tracing and relevant procedures would be revised to implement the requirement.

Contrary to the above, the licensee issued Revision 14 to WBNP-QCP-3.05, on July 19, 1982, abrogating the requirement for 100 percent inspection by signal tracing of safety related cables.

Description B - Deviation 50-390/82-27-06, 50-391/82-24-06

In the licensee's letter to the Director, NRC Region II, dated January 26, 1982, the licensee reported in accordance with 10 CFR 50.55(e), that the licensee would take corrective actions such that tamper-proof paint would be applied to junction boxes, condulets, or other equipment access covers.

Contrary to the above, on July 19, 1982, the licensee made a general revision of procedures to exclude the requirement for application of tamperproof paint to junction boxes, condulets, and other equipment access covers.

TVA Response

In connection with Watts Bar Division of Construction's reorganization into engineering and quality control functions and TVA's commitment to implement individual procedures governing engineering inspections and testing, a comprehensive program was initiated to review, restructure, and reformat site procedures into Quality Control Procedures, Instruction Procedures, and Test Procedures. This required that all procedures, approximately 150, be processed and checked against requirements. In all cases, inspection methods and procedural requirements were superseded with equal or more stringent inspection methods and procedural requirements. Some of these superseded methods had been implemented in the past in response to NRC actions and 50.55(e) items.

Corrective Actions Which Have Been or Will Be Taken

Deviation A

The commitment involving the use of signal tracing to verify cable routing implemented an audit method as an inspection tool to address a deficiency in the verification of cable routing. This was later superseded by visual verification of cable routing by a certified quality control inspector. A revision to our response of June 25, 1982, to violation 50-390/79-20-01, 50-391/79-16-01 is being prepared to indicate that visual verification of cable routing will be employed.

Deviation B

The use of tamperproof paint on electrical junction box covers, condulets, and equipment access covers was implemented as a means of detecting unauthorized lifting of electrical cable terminations (reference NCR W-20-P and associated corrective actions). This method proved to be ineffective for construction because of the number of cables in junction boxes which may not all be terminated at the same time, and was superseded by an enhanced procedure (WBNP-QCI-1.30) controlling rework of previously finalized features. In both cases TVA's objective was to strengthen the program by more specifically affixing responsibilities and controlling rework.

Corrective Actions Which Will Be Taken to Avoid Further Deviations

TVA has initiated a historical review of previous corrective actions involving site construction procedures. Any deviations from the original corrective actions will be identified and addressed in an amended response to those items.

Date Corrective Actions Will Be Completed

TVA is continuing the investigation of these deviations and affixing corrective action and action to avoid further deviations. We will supply additional information on this matter by November 30, 1982.