TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

NRC REGION II

December 16, 1982

82 DEC 20 A10:16

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 50-390/82-20 AND 50-391/82-20 - RESPONSE TO DEVIATIONS

The subject inspection report cited TVA with four deviations. Enclosed is our response to the citings. Our responses were discussed with Inspectors B. Miller and T. Conlin on December 9, 1982. The submittal date was discussed with Mr. Conlin on December 10, 1982.

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

8301040755 821223
PDR ADOCK 05000390
Q PDR

An Equal Opportunity Employer

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO DEVIATIONS

Deviation 390,391/82-20-01

The Watts Bar Fire Protection Evaluation submittal of September 9, 1980, Question 1, Table 1.1, states that a 3-hour fire barrier is to be maintained between the cable spreading room and other plant areas. TVA Drawing 47A381-9G indicates that the fire dampers in the ducts penetrating these fire barriers are to have a 3-hour resistant rating.

Contrary to the above, fire dampers 530 and 532 in the battery room exhaust and fresh air supply ducts which penetrate the fire barrier floor of the cable spreading room are rated at 1-1/2 hours in lieu of 3 hours.

TVA Response

Corrective Actions That Have or Will Be Taken

It was found that the dampers in question had incorrect mark numbers. Consequently, the correct mark numbered dampers will be installed and reinspected per WBNP-CP-4.27. Also, all fire dampers that were inspected by the inspector responsible for this deficiency will be reinspected and inspections performed on fire dampers by other inspection personnel will be reviewed to ensure that proper dampers are installed in accordance with current drawing requirements, all dampers discovered to be accepted in error will be reworked and reinspected per WBNP-QCP-4.27.

Actions Taken to Avoid Further Deviations

Inspection personnel will be reinstructed in the correct implementation of the requirements of WBNP-QCP-4.27.

Date Corrective Actions Will Be Completed

Reinstallation of dampers, reinstruction of inspectors, and reinspection will be completed by January 31, 1983.

Deviation 390,391/82-20-02

The Watts Bar Fire Protection Evaluation submittal of April 18, 1977, Section C.2, states that the design, installation, and tests associated with the fire protection systems are to be accomplished by written and approved instructions which are reviewed by qualified personnel to ensure that applicable regulatory and design requirements are properly and adequately specified.

Contrary to the above, construction drawings did not indicate how certain type fire dampers were to be field mounted in the duct sleeves. This resulted in some field mounted dampers, such as dampers 143, 145, and 323 not being installed in accordance with the manufacturer's requirements.

TVA Response

TVA acknowledges that a small number of the construction drawings used to install fire dampers do not provide adequate details on how fire dampers are to be field mounted in duct sleeves.

Corrective Action

All fire damper instruction drawings will be reviewed for adequate details. Those found to be deficient will be revised. All dampers which were installed according to the deficient drawings will be field inspected and, if necessary, modified to comply with the revised drawings.

Actions Taken to Avoid Further Deviations

Designers are being instructed to note design requirements and to ensure that adequate details are included in the appropriate construction drawings.

Date When Corrective Action will be Completed

All corrective action will be completed by June 30, 1983.

Deviation 390,391/82-20-04

The Watts Bar Fire Protection Evaluation submittal of April 18, 1977, Section E.3.(d) and submittal of September 9, 1980, Question 1 Table 1.1 state that the interior fire hose installation at Watts Bar will be designed for Class III Service as defined by National Fire Protection Association (NFPA) Standard 14, Standpipe and Hose Systems. NFPA-14 Sections 121(c), 212, 343, and 515 require a Class III standpipe system to be designed to supply a minimum water supply of 500 gal/min at a residual pressure of 65 lb/in^2 at the topmost outlet of the system with 2-1/2-inch fire hose outlets.

Contrary to the above, the fire hose standpipe system for the auxiliary building is not a Class III system in that this system is not designed to supply the required volume and is not provided with 2-1/2-inch fire hose outlets.

TVA Response

Watts Bar Fire Protection Evaluation submittal of April 18, 1977, Section E.3.(d) states: "Additional hose installations required as a result of the fire hazards evaluation will be designed for Class III service as defined in paragraph 121.C, 124, and 343 of NFPA 14."

TVA did not commit to change standpipes to Class III requirements that were already installed at the time the fire hazard analysis was submitted.

Table 1.1 of question 1 of the September 9, 1980, submittal is in error in that it does not differentiate between classifications of the standpipes. Table 1.1 will be corrected to reflect standpipes and other fire protection features as installed by June 1, 1983.

Deviation 390,391/82-20-06

The Watts Bar Fire Protection Evaluation submittal of April 18, 1977, Section F.7 and submittal of September 9, 1980, Question 1, Table 1.1, states that the 125V vital battery rooms and vital battery board rooms in the auxiliary building will be provided with an automatic preaction sprinkler system which is activated by a cross-zoned fire detection system.

Contrary to the above, the vital battery and battery board rooms in the auxiliary building are not provided with a preaction system but are equipped with a normally wet-type sprinkler system which is not provided with a water flow alarm to alarm in the event the system is activated.

TVA Response

The April 18, 1977, and September 9, 1980, submittals are in error. The vital battery board rooms and vital battery rooms are provided with manual actuated, dry-type sprinkler systems.

Corrective Actions that Have or Will Be Taken

The April 18, 1977, submittal, Section F7 and the September 9, 1980, submittal, question 1, Table 1.1 will be corrected. Also, TVA drawing 85M47W850-5, Flow Diagram, Fire Protection will be revised to indicate a dry sprinkler system for the battery and battery board rooms.

Actions Taken to Avoid Further Deviations

TVA is in the process of completely reviewing and correcting/updating both the April 18, 1977 and September 9, 1980 submittals. This will ensure that any similar-type errors are corrected.

Date Corrective Action Will Be Completed

Corrective action and actions to prevent recurrence will be completed by June 1, 1983.