

**TENNESSEE VALLEY AUTHORITY**

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

May 17, 1984

U.S. Nuclear Regulatory Commission  
Region II

Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-390/84-20, 50-391/84-16 - RESPONSE TO VIOLATION

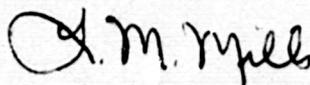
The subject inspection report cited TVA with a Severity Level IV Violation  
(390/84-20-04) in accordance with 10 CFR 2.201. Enclosed is our response  
to the subject violation.

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 are  
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Licensing

Enclosure

cc (Enclosure):

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

Records Center  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
NRC-OIE REGION II INSPECTION REPORT  
50-390/84-20 AND 50-391/84-16  
RESPONSE TO VIOLATION

Severity Level IV Violation--390/84-20-04

10 CFR 50, Appendix B, Criterion XI, requires that test procedures shall include provisions for assuring that all prerequisites for the given test have been met. The accepted QA Program (TVA-TR75-1A) states that the Office of Power Quality Assurance Procedure (OPQAP) -11.1 implements Appendix B, Criterion XI. Paragraph 6.3.1.1.f of OPQAP-5.1 states that "Prerequisites shall be identified which shall be completed and which conditions shall exist prior to performance of the activity. Prerequisites applicable only to certain sections of a procedure/instruction shall be so identified."

Contrary to the above, as of March 7, 1984, provisions for assuring that all prerequisites for the given test (Reactor Protection System Time Response Test, W7.1B) had not been met. The inspector verified the breaker positions on the panels per step 2.3.6 and found that 3 breakers were in the incorrect position. It should be noted that 2 of the 3 breakers which were discovered in the incorrect position had hold order tags attached. These hold order tags were hung on January 18, 1984; 35 days prior to step 2.3.6 of W7.1B being signed as verified.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation if Admitted

The test director signed prerequisite 2.3.6 on verbal assurance from Operations personnel that required verification had been completed without verifying the breaker availability himself.

Corrective Steps Which Have Been Taken and The Results Achieved

Immediately upon being notified of the problem associated with the three breakers being in the incorrect position, the responsible test engineer instituted a test exception against prerequisite 2.3.6 and voided the signature stating all conditions were met. An evaluation of the potential impact of the three breakers being in a position other than as stated was performed, and it was determined that no testing associated with W7.1B had been invalidated.

Additionally, increased efforts were made by Test Staff and Operations personnel to ensure that repositioning of breakers associated with W7.1B was made known to the test engineer responsible. Tags identifying equipment associated with W7.1B were conspicuously placed to inform responsible personnel to clear repositioning of equipment through the W7.1B test director.

Conduct of W7.1B then proceeded with the breakers associated with the test exception closed. The test exception was dispositioned and testing conducted per the requirements of section procedures.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Responsible test personnel were counselled in the necessity to either personally verify that all conditions stated in the prerequisites have been met or to have the person or persons performing the verification sign the prerequisite step.

Date When Full Compliance Will Be Achieved

TVA is now in full compliance.