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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

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WBRD-50-390/85-51  
WBRD-50-391/86-06

U.S. Nuclear Regulatory Commission  
Region II  
Attention: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - AS-CONSTRUCTED DRAWING PROGRAM  
DEFICIENCIES - WBRD-50-390/85-51, WBRD-50-391/86-06 - THIRD INTERIM REPORT

The subject deficiency was initially reported to NRC-Region II Inspector Al Ignatonis on October 9, 1985 in accordance with 10 CFR 50.55(e) as NCR WBN 6297. SCR WBN 6297-S was initiated to address the deficiency on a programmatic basis. Previous correspondence concerning this deficiency was submitted on November 14, 1985, January 13, February 19, May 20, and October 6, 1986.

TVA has not yet completed evaluation of the deficiency or determination of corrective actions needed. Enclosed, therefore, is our third interim report. We expect to submit our final report on or about February 2, 1987.

If there are any questions, please get in touch with J. A. McDonald at (615) 365-8527.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. A. Dornier*

Mr. Gridley, Director  
Nuclear Safety and Licensing

Enclosure

cc (Enclosure):

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

Mr. G. G. Zech  
Director, TVA Projects  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Records Center  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
Atlanta, Georgia 30339

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
AS-CONSTRUCTED DRAWING PROGRAM DEFICIENCIES  
WBRD-50-390/85-51, WBRD-50-391/86-06  
SCR WBN 6297-S  
10 CFR 50.55(e)  
THIRD INTERIM REPORT

Description of Deficiency

A condition has been identified at Watts Bar Nuclear Plant (WBN) in which various as-constructed drawings do not accurately reflect the actual installed configuration of plant components or features. This deficiency was identified by TVA's Division of Nuclear Construction (DNC) from a trend of several nonconforming condition reports (NCRs) which documented as-constructed drawing discrepancies. The deficiency is indicative of a generic condition involving the as-constructed drawing program for WBN unit 1. Examples of those NCRs are WBN 6297, WBN 6488, W-294-P, and W-313-P, which were reported previously. Several other similar NCRs have been identified and, including those listed above, are being incorporated into significant condition report (SCR) 6297-S.

Safety Implications

The failure to accurately reflect the installed configuration of safety-related structures, systems, or components (SSCs) at WBN on the as-constructed drawings could result in an indeterminate status of those SSCs. As such, the subject deficiency could adversely affect the safe operation of the plant.

Interim Progress

Since our October 6, 1986 submittal on this deficiency, TVA has established a task force to review both the as-constructed drawing program and the individual condition adverse to quality (CAQ) reports that have been included in the scope of SCR 6297-S.

The program review involves evaluation of the procedural requirements and methods for verification that the as-constructed drawing accurately reflects the field configuration. The verification methods evaluated involve review of documentation from the work control program and construction inspection/testing. The individual CAQ evaluation involves review to determine the cause, nature, and significance of the discrepancy and categorization of similar discrepancies to identify procedural and implementation weaknesses.

The task force effort is essentially complete. The task force has submitted a draft report, including program enhancement recommendations for management review. The evaluation is in process and, when finalized, the task force report will be the basis for the final 10 CFR 50.55(e) report. The final report will be provided to NRC on or about February 2, 1987.