

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

83 NOV 14 November 10, 1983  
AW: 22  
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  
50-390/83-35, 50-391/83-24 - RESPONSE TO VIOLATION

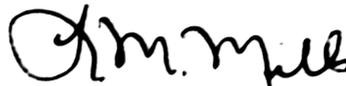
The subject inspection report cited TVA with a Severity Level IV Violation  
(390/83-35-01) in accordance with 10 CFR 2.201. Enclosed is our response  
to the subject violation.

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  
Atlanta, Georgia 30339

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## ENCLOSURE

### WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 NRC-GIE REGION II INSPECTION REPORT 50-390/83-35 AND 50-391/83-24 RESPONSE TO VIOLATION

#### Severity Level IV Violation 390/83-35-01

10 CFR 50, Appendix B, Criterion V, as implemented by Watts Bar FSAH Section 17, paragraph 17.1A.5 requires that activities affecting quality be prescribed by documented procedures and drawings and be accomplished in accordance with these procedures and drawings. Watts Bar QCP-4.23-8, Support Final Inspection, states the procedures and acceptance criteria for inspection of seismic pipe supports/restraints.

Contrary to the above, between September 12-16, 1983, activities affecting quality were not being accomplished in accordance with documented procedures and drawings in that a reinspection of eleven hangers revealed three hangers with deviations from documented requirements.

#### Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

#### Reasons For The Violation

The undersize weld on the snubber transition tube on hanger 1003B-1-03B-3 and the lack of pipe clamp lock nuts on hanger 1063-1-53-086 were not detected by Hanger Quality Control Unit (HQC) inspectors due to a lack of attention to detailed drawing requirements during inspections.

Deficiencies in baseplate dimensions and anchor type and size noted on hanger 1003A-1-03A-455 were caused by an oversight on the part of engineering personnel. The Hanger Engineering Unit (HEU) engineer responsible for the system at the time failed to incorporate the superseding drawing revision (R904), which changed baseplate configuration, in the existing work package. Subsequently, the engineer issued Field Change Request (FCR) H-9730 against revision R904 to effect changes concerning the snubber. At the time of inspection (April 4, 1983), the HQC inspector used drawing revision R903 and FCR H-9730. Noting the difference in revision levels on the drawing and the FCR, HQC requested a clarification of the changes dictated by revision R904. The responsible engineer at that time (who had replaced the previous engineer) incorrectly informed HQC that revision R904 did not affect the configuration of the baseplate. This erroneous answer was based on improper data supplied in the work package by the previous engineer.

#### Corrective Steps Taken and Results Achieved

The undersize weld on hanger 1003B-1-03B-3 has been repaired to comply with current drawing requirements and documented in accordance with procedures WBNP-QCP-4.23-4, "Support Visual Examination of Weld Joints," and WBNP-QCP-4.13-VTC, "Final Visual Weld Examination," as required by NCR 5085, which was closed October 10, 1983.

The lack of pipe clamp lock nuts on hanger 1063-1-63-086 was documented on NCR 5086, which required rework of this support to conform to current drawing requirements, and inspection in accordance with procedure WBNP-QCP-4.23-8, "Support Final Inspection." An inspection to verify the presence of lock nut was completed on September 28, 1983.

Anchor deficiencies noted on hanger 1003A-1-03A-455 will be corrected in accordance with NCR 5086, which will change anchors to comply with current drawings and require inspection to requirements of WBNP-QCP-1.14, "Inspection and Testing of Bolt Anchors Set in Hardened Concrete and Control of Attachments to Embedded Features," and WBNP-QCP-1.42-2, "Bolt and Gap Inspection for Bolt Anchor Assemblies." NCR 5086 also requires baseplate modifications to comply with drawing requirements to the extent possible. If the baseplate cannot be modified to comply with drawings, the configuration will be submitted to the Division of Engineering Design (EN DES) for review and disposition on FCR H-10679.

In order to determine if the failure to include appropriate drawings in the work package for hanger 1003A-1-03A-455 represented an isolated occurrence, all drawings in that work package were screened for similar discrepancies, and other work packages under the cognizance of that engineer were spot checked. No other discrepancies were noted.

#### Corrective Steps Taken to Avoid Further Violation

HQC inspectors were reinstructed in the applicable weld inspection provisions of procedures WBNP-QCP-4.23-4 and WBNP-QCP-4.13-VTC and bolting requirements of procedure WBNP-QCP-4.23-8. Emphasis was placed on attention to detailed drawing requirements and a clarification that these snubber transition tube welds are not vendor-made welds.

Failure to include correct revision level drawings in the work package was determined to be an isolated case. The responsible engineer's employment with TVA was terminated in December 1982 before identification of this violation.

#### Date When Full Compliance Will Be Achieved

Reinstruction of HQC inspectors was accomplished on November 1, 1983.

Modifications to support 1003A-1-03A-455 will be completed by December 15, 1983.