

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

84 OCT 3 P 2:18
September 28, 1984

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-390/84-37, 50-391/84-31 - RESPONSE TO VIOLATION

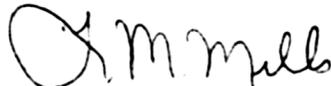
The subject inspection report cited TVA with a Severity Level IV Violation (390/84-37-02) and a Severity Level V Violation (390/84-37-01) in accordance with 10 CFR 2.201. NRC-OIE Inspector P. E. Fredrickson was notified on September 6 and 20, 1984 concerning the subject inspection report, and a new submittal date for this response was established. Enclosed is our response to the subject violation.

If you have any questions concerning this matter, 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

8411140301 841019
PDR ADDCK 05000390
G PDR

Watts Bar Nuclear Plant Units 1 And 2

NRC-OIE Region II Inspection Report

50-390/84-37 and 50-391/84-31

Response To Violation

Severity Level IV Violation - 390/84-37-02

1. 10 CFR 50, Appendix B, Criterion V as implemented by TVA's QA Topical Report TVA-TR75-1A Rev. 7, paragraph 17.1.5, requires that activities affecting quality be prescribed by procedures appropriate to the circumstances and be accomplished in accordance with these procedures.

- a. Administrative Instruction (AI) 2.12, "Clearance Procedure", R8 provides the direction whereby system isolation and configuration control is established for maintenance or protection of equipment/personnel.

Contrary to the above, activities affecting quality were not prescribed by procedures in that AI-2.12 did not prescribe proper position control of the "A" condensate storage tank to auxiliary feedwater pumps suction isolation valve, 1-FCV-2-504, which was under configuration control on June 12 and 13, 1984.

- b. AI-2.19, "Independent Verification", R0 requires that "when safety-related equipment is removed from service for maintenance or any other situation which requires that a clearance be established, the tagging procedure for both placing the tags and removing the tags shall require independent verification."

Contrary to the above, activities affecting quality were not accomplished in accordance with AI-2.19 in that tagging procedure AI-2.12 did not require that independent verification be conducted for removal of the tag on valve 1-FCV-2-504, resulting in the valve not being repositioned on June 13, 1984.

Admission or Denial of Violation

TVA agrees with the violation as stated.

Reasons for the Violation

Administrative Instruction (AI) 2.12, "Clearance Procedure", did not require independent verification of the valve lineup. AI-2.19 "Independent Verification" requires independent verification when removing tags and returning equipment to service. Operations personnel did not follow AI-2.19 when realigning auxiliary feedwater following a maintenance activity.

Corrective Steps Which Have Been Taken and the Results Achieved

Administrative Instructions (AIs) have been revised to more closely coordinate the activities of each instruction (AI-2.19 and AI-2.12). Operations personnel have been trained in the proper use of AI-2.19. All process systems main flow paths have been reverified to be in proper configuration and Field Quality Engineering (FQE) is auditing system configuration, independent verification documentation, and system lineups.

Corrective Steps Taken to Avoid Further Violations

All Operating and Administrative Instructions have been revised and training with emphasis on the importance of following approved procedures will be an ongoing process.

Date When Full Compliance Will Be Achieved

Watts Bar is now in full compliance.

Severity Level V Violation - 390/84-37-01

2. 10 CFR 50, Appendix B, Criterion V as implemented by TVA's QA Topical Report TVA-TR75-1A, Rev. 7, paragraph 17.1.4, requires that activities affecting quality be accomplished in accordance with documented procedures. Maintenance Instruction (MI) 3.2.1, Removal, Inspection and Replacement of the Motor Driven Auxiliary Feedwater Pump, Revision 3 requires, in a "NOTE" after Step 6.8.6, that ". . . the gap in the cutouts in the parting flange gasket should equal approximately .012."

Contrary to the above, activities affecting quality were not accomplished in accordance with MI-3.2.1, in that maintenance conducted June 20, 1984, on the 1B Motor Driven Auxiliary Feedwater Pump, failed to perform gap measurements in the parting flange (pump casing).

Admission or Denial of Violation

TVA denies the violation as stated. TVA interprets notes in procedures as cautionary in order to be an aid to the craftsman in the performance of the procedure and are not to contain action requirements. This provision is contained in AI 3.1 which implements the requirements of ANSI 18.7. However, it was intended, in this particular instance, that the gap measurement identified in the note after Step 6.8.6 of MI 3.2.1 be performed to verify installation of the proper gasket and to verify its uniform compression through proper torquing. The measurement was not meant to be a quality requirement but as a supplemental verification check. TVA agrees that the step was not performed as stated and that there is not absolute assurance that the step would have been performed had it not been called to the attention of the craftsmen by the inspector. The gap measurement was not made at the time because it was contained in a note rather than as a required step (inadequate procedure), and the craftsmen were not adequately instructed in the performance of the procedure. TVA has performed the gap measurement and revised the procedure to specifically require the gap measurement in future performances of the instruction.