

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

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July 18, 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
50-390/83-37, 50-391/83-26 - SUPPLEMENTAL RESPONSE

The subject inspection report cited TVA with a Severity Level IV Violation (390/83-37-01, 391/83-26-01) in accordance with 10 CFR 2.201. Our response to the stated violation was submitted on November 7, 1983. Enclosed is our supplemental 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
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

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 NRC-OIE REGION II INSPECTION REPORT 50-390/83-37 AND 50-391/83-26 SUPPLEMENTAL RESPONSE

Severity Level IV Violation 390/83-37-01, 391/83-26-01

10 CFR 50, Appendix B, Criterion V, as implemented by TVA Topical Report TVA-TR75, Revision 5, Section 17.1A.5, requires that activities affecting quality be accomplished in accordance with prescribed instructions, procedures, or drawings of a type appropriate to the circumstances.

Contrary to the above, the following items were identified in the Division of Power System Operations (DPSO), Engineering Design (EN DES), and Construction (CONST):

1. No evidence of procedures for the control of design documents and nonconformances within DPSO.
2. EN DES procedure EP-3.07, Revision 3, permits work to be performed using preliminary drawings and the issue of drawings outside of the CONST and Division of Nuclear Power established procedures.
3. Procedures were not followed in that approved relay setting sheets were not issued 30 days prior to preoperational testing (EP-3.07) and DPSO site personnel were not trained in CONST QA/QC procedures as required by ID-QAP 7.1, Revision 0.

Item 1

Admission or Denial of the Alleged Violation

TVA admits the first part of Item 1, "No evidence of procedures for the control of design documents within DPSO."

Reason for the Violation

The violation is a result of misinterpretation within DPSO as to where the document control procedures are required and applied.

Corrective Steps Taken And Results Achieved

DPSO has written a procedure(s) to control design documents such as relay setting sheets, drawings, motor curves, etc.

Corrective Steps To Be Taken To Avoid Further Violations

In order to avoid further violation, DPSO will instruct applicable personnel in the use of the document control procedure.

Date When Full Compliance Will Be Achieved

DPSO is now in full compliance with the control of design document procedure(s).

Response

TVA denies the second part of Item 1, "No evidence of procedures for the control of . . . nonconformances within DPSO."

On July 26, 1983, the DPSO issued the Power System Operations Quality Assurance Manual (PSOQAM). PSOQAM Procedure PSOQAP-9.1, RO entitled "Corrective Action" assures that conditions adverse to quality are promptly identified and corrected including nonconformances. By memorandum dated July 27, 1983, DPSO committed to having the PSOQAM in full compliance by October 19, 1983. However, because PSO's program had not had sufficient time to become fully implemented at the time of the inspection (September 13-16, 1983), PSO onsite engineering people were not aware of the procedure on corrective action and nonconformances. Although no nonconforming reports had been written at the time of the inspection, DPSO believes that PSOQAP 9.1, RO concerning nonconformances was fully adequate and should not be revised.

Item 2

Admission or Denial of the Alleged Violation

TVA admits that item No. 2 of the violation occurred as stated.

Reasons for the Violation

Revision 3 of EN DES-EP 3.07, "Protective Relays in The Nuclear AC Auxiliary Power System - Setting Instructions," both on the cover page and in the purpose and scope, uses words that imply control of PSO activities. Parts of the procedures which were intended only to describe actions which would be taken in PSO could be construed to control those activities, because of this inappropriate wording in the EP.

Step 2.11 of the procedure reads, "Sends two copies of the approved sheets to the project site (one for the plant superintendent's permanent record and one for use by the PSO site engineer)." This resulted in the indication that EN DES should transmit documents prepared in PSO directly to the PSO site engineer.

Corrective Steps Taken and Results Achieved

Revision 4 to EN DES-EP 3.07, "Protective Relays - Preparation and Review of Setting Instructions," has been prepared and reviewed in EN DES, PSO, and the Division of Nuclear Power (NUC PR). The cover sheet of this revision clearly states that PSO and NUC PR are mentioned for information only.

As originally proposed, revision 4 would have called for EN DES approved relay setting sheets to be sent to NUC PR and PSO for distribution. This procedure was in fact being followed, although Revision 4 had not yet been issued.

Corrective Steps to be Taken to Avoid Further Violations

A TVA procedure (Management Policy Requirement MPR 6.2.11) has been issued to identify responsibilities and interfaces in the different TVA organizations involved in preparing, approving, controlling, and implementing protective relay setting instructions. Revision 4 to EN DES-EP 3.07 was modified to conform to this document.

Date When Full Compliance Was Achieved

Revision 4 to EN DES-EP 3.07 has been issued and is controlling EN DES activities associated with protective relay setting instructions.

Item 3

Admission or Denial of Alleged Violation

TVA admits that item 3 of the violation occurred as stated.

Reasons for the Violation

Revision 3 of EP 3.07 was in effect at the time of this inspection, and does require EN DES approval and release of relay setting sheets 30 days before preoperational testing.

The requirement in EN DES-EP 3.07 was being modified, but the revision had not been issued.

CONST had deemed training in CONST QA/QC procedures unnecessary because CONST site procedure WBNP-QCI-3.19, "Equipment Tests Performed by Power System Operations Personnel" endorses the DPSO Field Test Manual as the procedure governing work conducted by DPSO personnel.

Corrective Steps Taken and Results Achieved

EN DES recognized that requiring approval and release of relay setting sheets 30 days before preoperational testing was unnecessary, unreasonable, and imposed a restraint on preoperational testing. To remove this restraint, EN DES revised the scoping document (section 3.3 of Preoperational Test TVA-13, "Onsite AC Power Distribution Systems") to state, "Preliminary setting sheets shall have been made by PSO and relays set accordingly. EN DES approval before preoperational testing would only be required for special cases to be identified by EN DES at the time of preoperational test instruction review." The scope requirement change was made because protective relays are tested independently of preoperational testing and, with very few exceptions, their set points do not affect system operation as verified in the preoperational test program. Proposed revision 4 to EN DES-EP 3.07 had been prepared and reviewed within TVA, and it stated "pertinent approved setting instruction should be on site 30 days before scheduled preoperational test." This procedure, because the preoperational test controlling document had been revised, was in fact being followed at the time of the violation, even though revision 4 of EP 3.07 had not been issued.

In addition to the CONST QA program orientation, DPSO personnel will be trained in applicable portions of the following CONST site procedures: WBNP-QCI-1.02, "Control of Nonconforming Items"; WBNP-QCI-1.08, "Quality Assurance Records", and WBNP-QCI-3.19. CONST will maintain records of DPSO personnel trained.

Corrective Steps to be Taken to Avoid Further Violations

MPR 6.2.11 has clearly identified preparation, approval, and control of protective relay setting instructions to be DPSO's responsibility. EN DES is now responsible for identifying protective relays whose operation affects the class 1E power systems and/or safety-related equipment, and for reviewing and approving setting instructions for these relays. This approval for construction permit (CP) plants shall be accomplished before receipt of an operating license. After receipt of an operating license, EN DES approval of setting instruction changes for these relays shall be accomplished before PSO approval and issuance of the changes.

Revision 4 of EN DES-EP 3.07 was modified to conform to these requirements.

CONST will notify the site DPSO supervisor by memorandum that the above training is required for all DPSO personnel presently at the Watts Bar site and any DPSO personnel assigned to Watts Bar in the future.

Date When Full Compliance Will be Achieved

Revision 4 to EN DES-EP 3.07 has been issued and is controlling EN DES activities associated with protective relay setting instructions.

CONST training of DPSO personnel has been completed.