

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

85 MAR 14 P 2:48

March 8, 1985

U.S. Nuclear Regulatory Commission
Region II
Attn: 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 - RESPONSE TO VIOLATIONS -
50-390/84-86-01, 50-391/84-58-01 - FAILURE TO ISSUE AUDITS WITHIN THE REQUIRED
TIME FRAME; 50-390/84-86-02, 50-391/84-58-02 - FAILURE TO STORE EQUIPMENT IN
ACCORDANCE WITH ANSI STANDARDS AND 50-390/84-86-03, 50-391/84-58-03 - ACCEPTANCE
OF MATERIAL WITHOUT ADEQUATE RECORDS

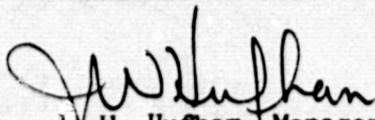
This is in response to R. D. Walker's letter dated February 7, 1985, report
numbers 50-390/84-86, 50-391/84-58 concerning activities at the Watts Bar
Nuclear Plant which appeared to have been in violation of NRC regulations.
Enclosed is our response to the citations.

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


J. W. Hufham, Manager
Licensing and Regulations

Enclosure

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

8507190596 850308
PCR ADOCK 05000390
Q PDR

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL V VIOLATION
50-390/84-86-01 AND 50-391/84-58-01
FAILURE TO ISSUE AUDITS WITHIN THE REQUIRED TIME FRAME

Description of Deficiency

10CFR50, Appendix B, Criterion V, requires activities affecting quality to be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. The licensee's accepted quality assurance program (TVA-TR75-1), Table 17D-2, endorses Regulatory Guide 1.144 and ANSI-N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants." Paragraph 4.4.6 of this standard and the licensee's implementing procedures require audit reports to be issued within 30 days.

Contrary to the above, quality assurance audit S-A-84-001 was conducted on March 26 through May 1, 1984, and distributed June 5, 1985.

This is a severity level V violation (Supplement II). Similar violations were brought to your attention in our letters dated August 24, 1983, and January 16, 1984.

TVA Response

Admission or Denial of the Alleged Violation

TVA denies that the violation occurred.

The actual field audit was conducted from March 26 to May 1, 1984. Since this audit was TVA-wide, several exit meetings were scheduled.

Chattanooga	- May 3, 1984
Knoxville	- May 14, 1984
Knoxville (OE)	- May 21, 1984

These three exit meetings were necessary due to the complexity of the audit and its findings. The three exit meetings and the dates on which they were held are listed on page Nos. 2 and 3 of audit No. S-A-84-001. The audit report was issued on June 5, 1984, 15 days after the final exit meeting. Future audit reports will reflect the last date of the audit as the day of the last exit meeting in order to avoid any confusion.

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL IV VIOLATION
50-390/84-86-02 AND 50-391/84-58-02
FAILURE TO STORE EQUIPMENT IN ACCORDANCE WITH ANSI STANDARDS

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, requires activities affecting quality to be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. The licensee's accepted quality assurance program (TVA-TR75-1), Table 17D-2, endorses Regulatory Guide 1.38 and ANSI N-45.2.2, "Packaging, Shipping, Receiving, Storage, and Handling of Items of Nuclear Power Plants." Paragraph 3.5 of this standard and the licensee's implementing Watts Bar Nuclear Plant (WBN) quality control procedure (QCP) 1.36, revision 5, require caps to be used to seal openings in items having sensitive internal surfaces. Further, paragraph 6.1.3 of this procedure prohibits consumption of food and drinks in warehouses except in designated areas.

Contrary to the above, several warehouses contained valves with end caps removed. Several warehouses contained evidence that soft drinks are being consumed in nondesignated areas.

This is a severity level IV violation (supplement II).

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation

This violation occurred as the result of failure to follow procedure WBN QCP-1.36, "Storage and Housekeeping." The absence of end caps on valves in the warehouses is attributed to personnel being unaware of the requirement to verify that all such openings are covered, capped, or plugged in "C" level warehouses. The evidence of consumption of food and soft drinks in unauthorized areas of the warehouses can be attributed to personnel discarding soft drink cans in trash cans located inside the warehouses, and the occasional consumption of these items in nondesignated areas.

3. Corrective Steps Taken and Results Achieved

The items in this violations and their resolution have been addressed in Storage and Housekeeping Deficiency Report 303, deficiencies 1, 2, and 3. The valve openings have been covered and/or end caps replaced on the subject valves. Personnel in the Warehouse Services Unit (WSU) have been instructed to eat and drink in designated areas only. Also, no trash cans will be allowed in warehouses to prevent soft drink cans from being picked up from outside and put inside the warehouse. Deficiency 303-1 was closed January 11, 1985, and deficiencies 303-2 and 303-3 were closed January 16, 1985.

4. Corrective Steps Taken to Avoid Further Violations

WSU personnel were reinstructed in WBN QCP-1.36, "Storage and Housekeeping," on January 14, 1985, with emphasis on paragraph 6.1.3, eating and drinking in designated areas only, and paragraph 6.3.5 concerning covers, caps, and plugs.

5. Date When Full Compliance Will Be Achieved

TVA is now in full compliance.

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL V VIOLATION
50-390/84-86-03 AND 391/84-58-03
ACCEPTANCE OF MATERIAL WITHOUT ADEQUATE RECORDS

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, requires activities affecting quality to be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. The licensee's accepted quality assurance program (TVA-TR75-1), Table 17D-2, endorses Regulatory Guide 1.123 and ANSI-N45.2.13-1976, "Quality Requirements for Control of Procurement of Items and Services for Nuclear Power Plants." Paragraphs 10.2(a) and (d) of this standard require that certificates of conformance identify the purchased material or equipment, such as by the purchase order number and be attested to by a person who is responsible for this quality assurance function.

Contrary to the above, the receiving inspector accepted a document on purchase order 677423 which did not identify the purchase order number and was not attested to by a person responsible for the quality assurance function.

This is a severity level V violation (supplement II).

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation

Incomplete receipt documentation occurred as a result of the failure to follow procedure WBN QCP-1.06, "Receipt Inspection of Safety-Related Items," in that the inspector's review of the certificate of compliance (COC) did not detect the vendors' omission of the contract number and an authorized signature at the time of receipt.

3. Corrective Steps Taken and Results Achieved

A sample of this receiving inspectors work has been reviewed and there was no evidence of this deficiency being a routine occurrence. A corrected COC has been received from the vendor.

4. Corrective Steps Taken to Avoid Further Violations

On February 20, 1985, responsible personnel were reinstructed in WBN QCP-1.06, "Receipt Inspection of Safety-Related Items," with emphasis on inspectors responsibilities in the review of vendor documentation.

5. Date When Full Compliance Will Be Achieved

TVA is now in full compliance.