

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5M 157B Lookout Place

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May 20, 1986

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 - SECOND INTERIM REPORT**

Region II was initially notified of four separate deficiencies in the subject area. Al Ignatonis was notified on October 9, 1985 of NCR WBN 6297 (WBRD-50-390/85-51) and on December 5, 1985 of NCR W-294-P (WBRD-50-390/86-07, WBRD-50-391/86-06). Paul Fredrickson was notified on December 17, 1985 of NCR W-313-P (WBRD-50-390/86-11), and Bob Carroll was notified of NCR 6488 (for which no CDR number was assigned) on January 3, 1986.

An interim report was submitted for NCR WBN 6297 on November 14, 1985 and for NCR W-294-P on January 13, 1986. On February 19, 1986, a letter was submitted to Region II indicating that we were combining these deficiencies and other related problems to report as-constructed drawing deficiencies on a programmatic basis.

In the future, TVA will use only WBRD-50-390/85-51 and WBRD-50-391/86-06 to track this problem. We therefore request that you close WBRD-50-390/86-07 and WBRD-50-390/86-11.

Enclosed is our second interim report for this deficiency. We expect to submit our next report on or about October 3, 1986.

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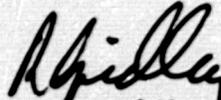
U.S. Nuclear Regulatory Commission

May 20, 1986

If there are any questions, please get in touch with R. H. Shell at
FTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. L. Gridley, Director
Nuclear Safety and Licensing

Enclosure

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

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

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)
SECOND 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 (NU CON) 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 NU CON 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. Many other NCRs have been identified but all, including those listed above, are being incorporated into significant condition report (SCR) 6297-S, which is for programmatic review of the deficiencies.

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

TVA established that the identified problems were largely caused by inadequate controls for revising drawings to document the actual configuration of installed components upon completion of work activities. The program for control of work has been completely restructured and now includes stringent requirements for the control of "as-constructed" configuration. WBN Quality Control Instruction (QCI) 1.60, "Work Control," was issued March 28, 1986 to implement those controls. The results of our evaluations of the NCRs to date indicate that this condition primarily applies to very detailed aspects of as-configured drawings which do not affect operation and maintenance of the plant. So far, only two instances have been identified which could have adversely affected plant safety.

A review and evaluation of the configuration control program is being conducted by TVA's Watts Bar Special Employee Concerns Program. Also, an operational design control review will be conducted by TVA's Division of Nuclear Engineering (DNE) to establish a unit 1 design baseline for plant functional features.

TVA will provide a final report on this item to the NRC by October 3, 1986.