### TENNESSEE VALLEY AUTHORITY

400 Chestnut Street Tower II 03 NOV 3 October 31, 1983 : 29

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:

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WATTS BAR NUCLEAR PLANT UNIT 1 - NRC-OIE REGION II INSPECTION REPORT 50-390/83-38, 50-391/83-27 - RESPONSE TO VIOLATION

The subject inspection report cited TVA with a Severity Level IV Violation (390/83-38-01) 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

# RESPONSE - NRC INSPECTION REPORT NOS. 50-390/83-38 AND 50-391/83-27 R. C. LEWIS' LETTER TO H. G. PARRIS DATED SEPTEMBER 30, 1983

#### 390-83-38-01

10 CFR 50. Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with instructions, procedures, or drawings. This requirement is implemented by the licensee's approved Quality Assurance Program, TVA-TR75-1, and the Operational Quality Assurance Manual (OQAM), Part II, Section 4.1 of the Preoperational Test Program.

Contrary to the above, preoperational testing was not performed as required by OQAM, Part II, Section 4.1, in that a safety-related test change was implemented prior to review and approval by the Plant Operations Review Committee and Plant Superintendent.

This is a Severity Level IV Violation (Supplement II). This violation applies to Unit 1 only.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

#### 2. Reasons for the Violation if Admitted

The preoperational test engineer erred in judgment by approving the continuation of testing before the Plant Operations Review Committee approval of safety-related change number 11 to TVA-6.

## 3. Corrective Steps Which Have Been Taken and the Results Achieved

All preoperational test section engineers have been informed of the specific requirements to ensure all change sheets have undergone the necessary review and approval cycle before implementation. A review of TVA-6 was performed, and no portion of the test was invalidated by this error.

# 4. Corrective Steps Which Will Be Taken To Avoid Further Viclations

All test engineers are receiving refresher training on the established requirements for preoperational testing. This training will continue on a routine basis throughout the remainder of the Watts Bar preoperational test phase. This training is the same as that referred to in our response to violation 50-390/83-32-01.

# 5. Date When Full Compliance Will Be Achieved

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We will be in full compliance by November 1, 1983, upon completion of refresher training.

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