

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

83 SEP 14 AIO: 36

September 12, 1983

WBRD-50-390/82-85  
WBRD-50-391/82-81

BLRD-50-438/82-57  
BLRD-50-439/82-51

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:

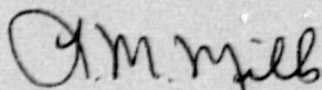
WATTS BAR AND BELLEFONTE NUCLEAR PLANTS UNITS 1 AND 2 - VOIDING OF  
ENGINEERING CHANGE NOTICES (ECNs) WITHOUT PROPER REVIEW - WBRD-50-390/82-  
85, WBRD-50-391/82-81, BLRD-50-438/82-57, BLRD-50-439/82-51, - FINAL  
REPORT

The subject deficiency was initially reported to NRC-OIE Inspector R. V.  
Crlenjak on August 16, 1982 in accordance with 10 CFR 50.55(e) as NCR GEN  
NEB 8208. This was followed by our interim reports dated September 15,  
1982 and January 26 and May 31, 1983. Enclosed is our final report.

If you have any questions concerning this matter, please get in touch with  
R. H. Shell at FTS 858-2688.

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

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1983-TVA 50<sup>TH</sup> ANNIVERSARY

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ENCLOSURE  
WATTS BAR AND BELLEFONTE UNITS 1 AND 2  
VOIDING OF ENGINEERING CHANGE NOTICES (ECNs) WITHOUT PROPER REVIEW  
NCR GEN NEB 8208  
10 CFR 50.55(e)  
WBRD-50-390/82-85, WBRD-50-391/82-81  
BLRD-50-438/82-57, BLRD-50-439/82-51  
FINAL REPORT

Description of Deficiency

10 CFR 50, Appendix B, Criterion VI, Document Control, states in part, "Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval unless the applicant designates another responsible organization."

TVA's Division of Engineering Design Engineering Procedure (EP) 4.02, paragraph 4.1.2, requires ECN review by selected Thermal Power Engineering (TPE) branches for ECNs written before issuance of an operating license. For ECNs written after issuance of an operating license, EP 4.02, paragraphs 6.1.2 and 7.1.2, requires a safety and technical review of each ECN by all TPE branches.

Procedure EP 4.02, paragraphs 4.4, 6.3, and 7.3, addresses the process established to void ECNs. This procedure allowed the voiding of a TPE branch reviewed and approved ECN without being reviewed and approved by the same organizations that performed the original review and approval. Therefore, EP 4.02 did not implement 10 CFR 50, Appendix B, Criterion VI. Also, because of the interrelation between ECNs at a nuclear plant, the safety evaluation for one ECN may be dependent on another ECN being implemented. Therefore, the voided ECN and associated safety evaluation should be reviewed for potential impacts on other ECNs.

Safety Implications

The voiding of an ECN for a safety-related system without proper review could result in a significant deficiency in the final design and/or construction of the system. Such a deficiency could have adverse effects on the safe operations of the plant.

Corrective Action

EN DES-EP 4.02, revision 12, included the requirement that all TPE branch ECNs that are to be voided will be reviewed and voidance approved by the same organizations that performed the original review and approval. The ECN may then be voided only in cases where there were no safety implications or adverse technical reasons. An unresolved safety question determination (USQD) is to be performed to determine if there are any safety impacts on other approved ECNs. This requirement appears in EN DES-EP 2.03.

In order to prevent recurrence, the sections in EN DES-EP 4.02 concerning the voiding of an ECN were changed in revision 12 (issued February 3, 1983) such that any EN DES Engineering Support Branch which initially reviewed the ECN must review the voidance of the ECN.