

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

APR 3 AIO: 04
April 4, 1984

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 NUCLEAR PLANT - NRC-OIL REGION II INSPECTION REPORTS
50-390/83-26 AND 50-390/83-32, 50-391/83-21 - REVISED RESPONSE

The subject inspection reports cited TVA with one deviation (390/83-26-01) and a Severity Level IV violation (390/83-32-01) in accordance with 10 CFR 2.201. A response to the deviation and violation was submitted on September 22 and October 24, 1983, respectively.

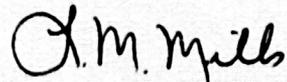
The Nuclear Regulatory Commission (NRC) requested (in their letter to H. G. Parris dated February 28, 1984) that TVA provide a supplemental or revised response for the subject inspection reports. Enclosed is our revised response.

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

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Institute of Nuclear Power Operations
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Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

TVA failed to ensure strict compliance with established requirements for documentation of preoperational testing activities. Preoperational Test Section supervisors considered strict compliance with documentation requirements to be standard practice for Preoperational Test engineers and thereby failed to provide the personnel instruction and adequate reviews of test documentation in progress to ensure compliance with established requirements.

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

Test activities on TVA-22 were immediately halted.

Preoperational Test Section supervisory personnel discussed the requirements of OQAM, Part II, Section 4.1, with the test personnel associated with TVA-22 and emphasized that strict compliance was imperative. The plant superintendent directed that supervisory personnel be assigned to monitor all subsequent testing activities concerning TVA-22 and no further deficiencies were noted. Documentation associated with all other preoperational tests which were in progress was reviewed for deficiencies with no significant deficiencies discovered. The Field Quality Engineering (FQE) Section has begun to survey preoperational testing in progress for compliance to all OQAM requirements and no significant deficiencies have been identified.

All documentation associated with TVA-22 (including the test director's log, test exceptions, valve and instrumentation checklists, procedure change sheets, and test prerequisites) was evaluated and disposition made of discrepancies in accordance with established procedures. There were no discrepancies identified which required invalidation of test results.

NRC Inspector, M. Thomas, stated in Report No. 50-390/83-38 that changes to two additional preop tests, TVA-18A and TVA-27B, were two additional examples of changes that were erroneously handled as nonsafety-related. An evaluation of TVA-18A determined that change notice 1 should have been reviewed as safety-related and the acceptance criteria deleted by change number 1 was added to TVA-18C by safety-related change number 33. An evaluation of TVA-27B also determined that change notice number 14 should have been reviewed as a safety-related change and was superseded by safety-related change number 19.

4. Corrective Action Which Will Be Taken To Avoid Further Violations

Preoperational Test Section supervisory personnel are more closely monitoring the performance of preoperational tests to ensure proper documentation. All section personnel are receiving refresher training

on administrative controls for testing to ensure a better understanding of the established requirements for preoperational testing. This training will continue on a routine basis throughout the remainder of the Watts Bar preoperational test phase. The FQE Section is performing surveys of tests in progress to identify discrepancies.

5. Date When Full Compliance Will Be Achieved

We are currently in full compliance.

All administrative and documentation reviews have been completed. Retesting of portions of TVA-22, which are required due to deferment of portions of the original test during hot functional testing and planned modifications to the auxiliary feedwater system, will be completed before unit 1 fuel loading.

ENCLOSURE

WATTS BAR NUCLEAR PLANT
REVISED RESPONSE TO NRC-OIE LETTER
FROM R. C. LEWIS TO H. G. PARRIS DATED FEBRUARY 28, 1984

Deviation 50-390/83-26-01

FSAR Section 9.3.1.4 states that preoperational testing of the compressed air system is to be performed as prescribed in Regulatory Guide 1.80, "Preoperational Testing of Instrument Air Systems." Regulatory Guide 1.80 states that a loss of instrument air supply test be conducted on all branches of the system simultaneously, if practicable, or on the largest number of branches of the system that can be adequately managed.

Contrary to the above, a loss of instrument air supply test is being conducted on each valve of the system individually per preoperational test TVA-27B, "Auxiliary Control Air System."

Response

1. Description of Corrective Actions That Have Been or Will be Taken

A preoperational test exception was previously written to defer completion of individual valve loss of air tests pending receipt of the NRC response. We have subsequently notified our Division of Nuclear Power preoperational test director of the NRC position on this matter with instructions to perform the slow loss of air tests simultaneously on as many valves as possible per the original test scope. The requirement that the remainder of the plant be maintained in as close to normal operating condition as possible is also included in the test instruction such that the slow loss of air tests may be performed ideally during integrated hot functional testing. Of course, the need for exceptions to Regulatory Guide 1.80 requirements is noted within paragraph C.8.a of the guide and has the following applicability to Watts Bar Nuclear Plant (WBN) which we provide for information.

Exception No. 1:

Certain valves where required by "operating procedure requirements . . . or equipment safety factors" to be maintained in a certain position during the hot functional testing may be waived from the simultaneous slow loss of air test (e.g., main steam atmospheric relief valves, steam generator level control valves, etc.). Such exceptions are allowed by paragraph C.8.a of Regulatory Guide 1.80 and will be documented in the test instruction results package on a case-by-case basis.

Exception No. 2:

The WBN auxiliary air system is common to both units. Since it is expected that the unit 2 hot functional test will be performed during normal commercial operation of unit 1, it will not be practicable to perform the slow loss of air testing on all (unit 2) valves simultaneously (i.e., unit 2 valves cannot be physically segregated from unit 1 valves due to common supply headers and branches--see Figure 9.3-4 of the WBN FSAR). In such cases "the largest number of branches of the system that can be adequately managed" will be tested simultaneously and documented in the test instruction results package.

2. Description of Corrective Actions Which Will Be Taken to Avoid Further Deviations

TVA will continue to perform preoperational or other type tests based on their best understanding and in full compliance with associated regulatory guides where required by SAR commitment. In cases where full compliance is not possible or practical, the FSAR text will be revised in a timely manner to reflect the deviation.

3. Date Corrective Actions to be Taken

All corrective action will be taken by June 14, 1984, for unit 1 and by December 3, 1985, for unit 2.

Severity Level IV Violation - 390/83-32-01

10 CFR 50, Appendix B, Criteria XI requires that a test program shall be established to assure that all testing, including preoperational testing, is identified and performed in accordance with written test procedures. This requirement is implemented by the licensee's approved Quality Assurance Program TVA-TR75-1, section 17.2.11 and the Operational Quality Assurance Manual (OQAM) Part II, Section 4.1 for the Preoperational Test Program.

Contrary to the above, preoperational testing was not performed as required by the licensee's approved Quality Assurance Program as implemented by OQAM, Part II, Section 4.1 in that on August 15 and 16, 1983, during review and observation of test TVA-22 "Auxiliary Feedwater System," the inspector noted the following deficiencies: several equipment failures that occurred during testing were not documented in deficiency notices; a test change notice that affected the scope of the testing was not handled as a safety-related change; testing took place on the Turbine Driven Auxiliary Feedwater (TDAFW) Pump with the control system in an abnormal configuration (i.e., FT-142 valved out) with no change to the test procedure; data sheets, valve check lists, and instrument check lists were either incomplete or improperly filled out; there was no disposition of exception notices that affected the hot functional testing of the system; and there was either no reverification of testing conditions before resumption of testing or it was not properly documented.

This violation applies to Unit 1 only.