TENNESSEE VALLEY AUTHORITY

5N 157B Lookout Place

April 23, 1986 8:20

WBRD-50-390/86-40
WBRD-50-391/86-39

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 - DISCREPANCY IN CLASSIFICATION OF AUXILIARY AIR PIPING - WBRD-50-390/86-40, WBRD-50-391/86-39 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector Bob Carroll on March 26, 1986 in accordance with 10 CFR 50.55(e) as SCR WBN EEB 8626. Enclosed is our final report.

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

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
DISCREPANCY IN CLASSIFICATION OF AUXILIARY AIR PIPING
WBRD-50-390/86-40, WBRD-50-391/86-39
SCR WBN EEB 8626
10 CFR 50.55(e)
FINAL REPORT

Description of Deficiency

The auxiliary air system (AAS) at Watts Bar Nuclear Plant (WBN) is an essential safety-related system as described in the WBN FSAR, section 9.3.1. the AAS compressor package was procured as the best available and, as such, was reclassified from TVA safety class C to TVA class G with quality assurance (QA) documentation required, by engineering change notice (ECN) 3189 in November 1981. In implementing ECN 3189, a section of TVA-supplied interconnecting piping between the receiver tanks on the compressor package was also reclassified to TVA class G. This piping was installed by TVA to ASME Code Section III requirements and was originally classified as TVA class C. As a result of the reclassification, applicable QA documentation relating to the installation of the piping was deleted.

This condition has also been identified in NRC Violation No. 390,391/86-02-03, which was transmitted to TVA in J. A. Olshinski's letter to S. A. White dated March 20, 1986.

TVA has determined that this deficiency was the result of design personnel considering the affected piping as a portion of the compressor package in the reclassification. This is considered to be a design oversight, attributable to a lack of detailed procedural requirements.

Safety Implications

The reclassification of the subject piping to TVA class G removed the requirement for maintaining QA control of the piping. As such, it cannot be assured that future modifications or repairs to this piping would be adequate. Therefore, the subject condition could adversely affect the safety of operations of the plant.

Corrective Action

TVA has initiated ECN 6289 in order to reclassify the TVA-supplied interconnecting piping to TVA class C. This will be accomplished by reinstating/regenerating all applicable documentation or by replacing the interconnecting piping to TVA class C requirements. TVA will perform a review of all TVA safety class G systems requiring QA documentation to ensure that no other deficiencies of this type have occurred. All necessary rework and redocumentation for the subject piping and the review will be completed prior to initial fuel loading for WBN unit 1.

TVA's Division of Nuclear Engineering (DNE) has issued new engineering procedures since the occurrence of this deficiency. The new procedures require a greater level of detail in the preparation, review, and implementation of ECNs, and will prevent recurrence of this type deficiency. All DNE personnel were trained to the requirements of the new procedures in June 1985.