

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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May 24, 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 UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-390/84-25, 50-321/84-20 - RESPONSE TO VIOLATIONS

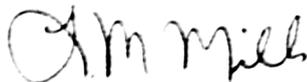
The subject inspection report cited TVA with a Severity Level IV Violation (390/84-25-01) and a Severity Level V Violation (390/84-25-02) in accordance with 10 CFR 2.201. Enclosed is our response to the subject violations.

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
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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
NRC-OIE REGION II INSPECTION REPORT
50-390/84-25 AND 50-391/84-20
RESPONSE TO VIOLATIONS

Severity Level IV - Violation 390/84-25-01

10 CFR 50, Appendix B, Criterion XVI, as implemented by Section 17.1A.16 of the Watts Bar FSAR requires that, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition." TVA's Construction Discrepancy Report (CDR) WBRD-50-390/83-59 reported to Region II that significant conditions adverse to quality existed in welding on structural steel in the main steam valve rooms. TVA concluded that welds on structures depicted in TVA's Division of Engineering Design (ENDES) drawing series 48W1707 and 48W1708 were not in compliance with drawing and welding specifications. On October 18, 1983, TVA notified Region II in a final report to WBRD-50-390/83-59 that all corrective action for this deficiency would be completed by March 3, 1984.

Contrary to the above, on March 27, 1984, corrective actions taken by TVA had not been effective in identifying and correcting deficiencies, deviations, and nonconformances of welds on structural steel, in that a reinspection by the NRC revealed defective welds on two of four drawings selected to sample TVA corrective action.

Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

Reasons for the Violation

TVA's Division of Construction (CONST) quality control inspectors who tabulated substandard welds to be reworked as corrective action to NCR 4753 (WBRD-50-390/83-59) failed to transcribe some welds from the inspection drawing to the list to be reworked. Contributing to this failure was the fact that the inspectors did not identify the difference between the acceptance criteria of the accepted disposition of NCR 4753 and the current rework criteria of TVA General Construction Specification G-29C.

Corrective Steps Taken and Results Achieved

Nonconforming condition report 5561 (WBRD-50-390/84-20) was initiated to accomplish reinspection of the welds in question. This NCR was referred to Engineering Design for disposition and has been reported to the NRC under 10 CFR 50.55(e). The resolution of this reportable condition is described in the final report from L. M. Mills to J. P. O'Reilly dated May 2, 1984.

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2
NRC-OIE REGION II INSPECTION REPORT
50-390/84-25 AND 50-391/84-20
RESPONSE TO VIOLATIONS

Severity Level V - Violation 390/84-25-02

10 CFR 50, Appendix B, Criterion V, as implemented by Watts Bar FSAR, Section 17, paragraph 17.1A.5 requires that activities affecting quality be prescribed by documented instructions and procedures of the type appropriate to the circumstances and shall be accomplished in accordance with these instructions and procedures.

Contrary to the above, on March 28, 1984, TVA did not have instructions or procedures that would prevent unauthorized personnel from removing the Reactor Building annulus drain sump grating in that: the grating was observed removed from the drain sump and debris was observed in the drain sump larger than could pass through the system's in line butterfly type valves. This system had been flushed and turned over to TVA's Power Production Division in 1982.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation if Admitted

We are unable to determine exactly who removed the grating or when the grating was removed from the Reactor Building annulus drain sump. There are not hold downs or tags to indicate that the grating should be kept in place to ensure system cleanliness. To the best of our knowledge, the grating was removed during vacuum testing of the annulus to search for air inleakage through the sump.

Corrective Steps Which Have Been Taken and the Results Achieved

The sump has been cleaned and the cover replaced. An inspection of the line from the annulus drain sump down to the isolation valve will be made and any debris that could block the valve will be removed.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The grating will be tack welded to prevent inadvertent removal. House-keeping inspections will be performed in the annulus area as required by plant instructions, AI-1.8, to ensure area cleanliness.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance by June 1, 1984.