TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street ower II

84 SEP 18 P2:35

September 14, 1984

WBRD-50-390/84-41
WBRD-50-391/84-36

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - ACTIVE COMPONENTS PROCUREMENT DEFICIENCIES - WBRD-50-390/84-41, WBRD-50-391/84-36 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector Floyd Cantrell on July 23, 1984 in accordance with 10 CFR 50.55(e) as NCR WBN MEB 8429. Our first interim report was submitted on August 21, 1984. Enclosed is our final report.

Please note that TVA no longer considers the subject condition to be adverse to the safe operations of the plant. Therefore, we will amend our records to delete this nonconformance as a 10 CFR 50.55(e) item.

If you have any questions, 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: Mr. Richard C. DeYoung, 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
ACTIVE COMPONENTS PROCUREMENT DEFICIENCIES
WBRD-50-390/84-41 AND WBRD-50-391/84-36
10 CFR 50.55(e)
FINAL REPORT

Description of Deficiency

On August 8, 1983, TVA issued a Division of Engineering Design (EN DES) calculation No. NEB 830808 218 entitled, "Active Components List." This calculation provides a list, by system, of all active components in Watts Bar Nuclear Plant (WBN). Most of the components for WBN were procured before the issuance of this calculation. It has now been identified that various components required to be active by this calculation were not procured as active. The definition of an "active" component is found in Regulatory Guide 1.48. However, the definition of active found in Regulatory Guide 1.48 was not the sole criteria used in developing the active component calculation.

Additionally, WBN FSAR Tables 3.9-17, -25, -27, and -28 list various components which are required to be active. The WBN FSAR lists do not agree with calculation No. NEB 830808 218. A cursory review of the valves procured for the essential raw cooling water (ERCW) system showed that the active valve procurements agreed with the WBN FSAR tables, but did not agree with calculation No. NEB 830808 218.

Safety Implications

TVA has performed a review of all active components listed in calculation No. NEB 830808 218. This review was conducted to determine if the listed components were procured as active. Since no pumps were added to the active components list (i.e., no change from earlier lists), pumps were not included in this review. The results of the review showed that not all valves were procured as active. However, those valves which were not procured as active were determined to fall within one of the following categories.

1. Valves Procured Before September 1974

   Requirements for designating a component as "active" are found in Regulatory Guide 1.48. Since TVA committed to procuring components to Regulatory Guide 1.48 requirements for WBN in September 1974, the requirement to identify these valves as active in procurement documents was nonexistent before September 1974. Consequently, valves falling into this category do not require any additional operability assurance as defined by Regulatory Guide 1.48 and, as such, are considered to be acceptable for use as-is.

2. Valves Listed Erroneously as Active in Calculation No. NEB 830808 218

   TVA's Nuclear Engineering Support Branch (NEB) reviewed those valves which were procured after September 1974 as nonactive. If any of those valves did not meet the Regulatory Guide 1.48 definition of active, their status was changed to nonactive. Since these valves are, in fact, not active valves per Regulatory Guide 1.48, they are acceptable for use as-is.

3. Active Valves Which TVA Qualified

TVA's Civil Engineering Support Branch (CEB) reviewed those valves which were not procured as active and which did not fall into categories 1 or 2. All of these valves were qualified by CEB's Component Qualifications Group to assure that each valve would function as required during a design basis seismic event. All of these valves were found to be acceptable for use as-is.

As a result of TVA's review of active components, it has been determined that all valves required to be active which were procured as nonactive are acceptable for use as-is. Thus, had this deficiency remained uncorrected, it could not have adversely affected the safety of operations of the plant.

Therefore, TVA no longer considers 10 CFR 50.55(e) applicable to this item.