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

May 5, 1983

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U.S. NRC RGN-II
ATLANTA, GA.

WBRD-50-390/83-25
WBRD-50-391/83-24
BLRD-50-438/83-29
BLRD-50-439/83-24

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 - QA PROGRAM DEFICIENCIES PERTAINING TO TVA PERSONAL SERVICES CONTRACT (TV-49510A) - WBRD-50-390/83-25, WBRD-391/83-24, BLRD-50-438/83-29, BLRD-50-439/83-24 - FIRST INTERIM REPORT

The subject deficiency was initially reported to NRC-OIE Inspector Linda Watson on April 6, 1983 in accordance with 10 CFR 50.55(e) as Audit 83V-26 Deficiencies Numbers 1, 2, and 3. Enclosed is our first interim report. We expect to submit our next report by September 21, 1983.

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

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
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Atlanta, Georgia 30339

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ENCLOSURE

WATTS BAR AND BELLEFONTE NUCLEAR PLANTS UNITS 1 AND 2
QA PROGRAM DEFICIENCIES PERTAINING
TO TVA PERSONAL SERVICES CONTRACT (TV-49510A)
10 CFR 50.55(e)
WBRD-50-390/83-25, WBRD-50-391/83-24
BLRD-50-438/83-29, BLRD-50-439/83-24
AUDIT NO. 83V-26 DEFICIENCY NO. 1, 2, AND 3

Deficiency Description

Deficiency No. 1 -

TVA's Division of Engineering Design's (EN DES) engineering procedure (EP) 1.01, paragraph 2.1, "Policy," states that:

"NRC requires that all activities affecting the quality of design, construction, and operation of TVA nuclear projects will be done within a controlled system of written instructions and procedures. These written instructions and procedures therefore will be: (a) prepared and approved as described in this EP or EN DES-EP 1.44, "Handling," (b) issued before the QA-related activities begin, and (c) available for use at the location of QA-related activities."

Contrary to this requirement, Audit No. 83V-26 has found that:

1. Gilbert Associates with whom TVA has the personal services contract (TV-49510A) has not received formal documented instructions on methods and procedures to be followed in performing/documenting piping analysis. This pertains to both Watts Bar and Bellefonte tasks now under way.

2. Work for the task being audited (task 2 to personal service contract TV-49510A) is being performed totally under the TVA program. However, while work had begun in 1979, the first effort of documenting the applicable TVA procedures to operate under took place in November 1982 (Watts Bar). Some Bellefonte work has been accomplished during 1983 before establishing a program. Review of the method (or proposed method) of implementing a QA program with the two TVA Civil Engineering Branch (CEB) piping analysis groups (Watts Bar and Bellefonte) indicates that different methods of implementation are intended for the same task.

3. The mechanical analysis (MA) piping analysis handbooks are being used as design instructions by Gilbert. In addition, when EN DES-EP 3.26, "Detailed Piping Analysis Performed by TVA-Procedures for Documentation and Verification," was retired, the MA handbooks were specifically identified as replacement instructions. Although the handbook for Bellefonte is in draft form and lacks formal approval, it is being used to perform piping analysis. In addition, the handbook policy statement indicates that the handbooks are not quality assurance documents.