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JUN 08 1993

U.S. Nuclear Regulatory Commission
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Gentlemen:

In the Matter of the Application of)
Tennessee Valley Authority) Docket Nos. 50-390
50-391

WATTS BAR NUCLEAR PLANT (WBN) - NRC INSPECTION REPORT 50-390,391/93-24 -
REPLY TO NOTICE OF VIOLATION

The purpose of this letter is to respond to a notice of violation identified May 9, 1993. The notice of violation involves the failure of TVA (WBN) to adequately resolve in 1985 whether all Unit 1 vendor wired safety-related electrical panels were properly wired.

Enclosure 1 contains TVA's response to the notice of violation. In response to a verbal request by NRC, Enclosure 2 provides supplemental information to further respond to NRC Inspection Report 50-390, 391/93-16. Enclosure 3 contains a list of commitments made in this submittal.

As discussed during a telephone conversation between G. L. Pannell (TVA) and the NRC Region II staff on June 8, 1993, a discussion about the adequacy of the Corrective Action Tracking Document (CATD) resolution process and TVA's ability to track Class C employee concerns to resolution is not being provided in this submittal. These subjects will be discussed during the June 18, 1993, NRC management meeting. Any followup written response will be provided by a schedule determined at the meeting.

If you have any questions, please telephone P. L. Pace at (615) 365-1824.

Very truly yours,

William J. Museler

Enclosure

cc: See page 450060

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT (WBN) - UNITS 1 AND 2
REPLY TO NOTICE OF VIOLATION 50-390, 391/93-24-01

NOTICE OF VIOLATION (NOV) 50-390, 391/93-24-01

10 CFR 50 Appendix B, Criterion XVI, Corrective Action, states that conditions adverse to quality, such as deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

This requirement is implemented through the TVA Nuclear Quality Assurance Plan (TVA-NQA-PLN-89-A), section 10.0, Adverse Conditions, which requires that adverse conditions be identified and resolved in accordance with documented plans.

Contrary to the above, from 1985 to March 16, 1993, the licensee failed to adequately resolve whether all vendor wired safety-related electrical panels were properly wired in that, after a walkdown of 40 vendor wired electrical panels found that many labeling problems and some wiring nonconformances existed, the licensee inappropriately accepted the remaining panels, without inspection, based on an unsupported assumption that all discrepancies found would be labeling problems.

TVA REPLY TO NOV 50-390, 391/93-24-01

Background Information

Deficiencies in vendor wired safety-related electrical panels were identified during a configuration control walkdown of various Unit 1 panels in 1984. The deficiencies were documented in Nonconformance Report (NCR) W-205-P. The deficiencies can be categorized as: (1) labeling deficiencies (primarily on vendor wiring), (2) wiring/configuration control deficiencies (e.g., wires on different terminal than shown on drawings), or (3) physical problems (e.g., nicks on insulation and loose terminal connections). The deficiencies which required correction were resolved through rework or drawing changes. The NCR was determined to not be significant and was closed in 1985 without requiring a walkdown of any additional panels.

An opportunity to capture the failure to inspect the remaining Unit 1 vendor wired safety-related electrical panels occurred in 1987. An Employee Concerns Special Project (ECSP) review team did not recognize that the physical deficiencies associated with NCR W-205-P had not been adequately dispositioned for the uninspected panels.

In January 1993, WBN Site Quality Assurance personnel reviewed the ECSP evaluation of NCR W-205-P during an audit (WBA93307). In February 1993, the generic applicability and significance determinations of the NCR were questioned and documented in Finding Identification Reports WBFIR930014307 and WBFIR930012307, respectively.

ENCLOSURE 1

WATTS BAR NUCLEAR PLANT (WBN) - UNITS 1 AND 2
REPLY TO NOTICE OF VIOLATION 50-390, 391/93-24-01

The Reason For The Violation

The cause for the violation is inadequate resolution of NCR W-205-P. No documentation could be located to explain why the remaining Unit 1 vendor wired safety-related electrical panels were not inspected for the types of physical deficiencies documented in NCR W-205-P.

Corrective Steps That Have Been Taken And Results Achieved

1. TVA reviewed the disposition of the three categories of deficiencies documented in NCR W-205-P with the following results:

TVA does not view the unidentified labeling deficiencies on the uninspected vendor wired safety-related electrical panels to be an issue. An engineering evaluation documented in Problem Identification Report PIRWBNWBP8770 provides the basis for this determination. No further corrective action is planned.

The Design Baseline and Verification Program (DBVP) Corrective Action Plan (CAP) and startup testing procedures were reviewed to ensure that these programs detect and correct configuration control/wiring errors. These programs ensure that the functional configuration of portions of systems which are required to mitigate design basis events are accurately depicted on plant control room drawings. Safety-related control room drawings include electrical single line and schematic drawings. No further corrective action is planned.

A detailed engineering evaluation of the non-labeling deficiencies documented in NCR W-205-P was performed based on the descriptions of the deficiencies in available documentation. Physical wiring deficiencies documented in Maintenance Requests A-491739 (Items B and C) and A-495629 (Items B, C, D, and F) were determined to contain some deficiencies which could adversely affect the safe shutdown of the plant, if left uncorrected.

2. TVA will develop inspection criteria and perform a walkdown of those vendor wired safety-related electrical panels required for Unit 1 operation which were not previously included in the NCR W-205-P walkdown. This action is scheduled to be completed prior to turnover of the last affected electrical system to the operations staff.

ENCLOSURE 1

WATTS BAR NUCLEAR PLANT (WBN) - UNITS 1 AND 2
REPLY TO NOTICE OF VIOLATION 50-390, 391/93-24-01

Corrective Steps That Will Be Taken To Avoid Further Violations

1. TVA will perform a random sample of NCRs closed prior to March 1987, classified as not being significant, and which were dispositioned as rework, reject, or other. (NCRs dispositioned as repair or "use-as-is" were previously evaluated.) This review will determine whether NCRs in the sample population could have adversely affected the safe operation of the plant, if left uncorrected. This action is scheduled to be completed by August 31, 1993.
2. TVA's Corrective Action Program has been revised and improved on two occasions since NCRs were last generated. In 1987, TVA changed to a "one form" Corrective Action Program. Deficiencies were documented on one form and classified as either significant Condition Adverse to Quality Reports (CAQRs), non-significant CAQRs, or Problem Reportability Determinations (PRDs). In 1991, TVA changed the Corrective Action Program to where the majority of deficiencies are documented on Significant Corrective Action Reports (SCARs), Problem Evaluation Reports (PERs), or Finding Identification Reports (FIRs). Throughout these program changes, enhancements have been made to the process for resolving deficiencies. Therefore, no further recurrence controls are required.

The Date When Full Compliance Will Be Achieved:

TVA will be in full compliance upon turnover of the last affected electrical system to the operations staff.

ENCLOSURE 2

**SUPPLEMENTAL RESPONSE
TO NRC INSPECTION REPORT 50-390, 391/93-16**

SUPPLEMENTAL RESPONSE

In a recent telephone conversation, the NRC requested that TVA clarify the response to NRC Inspection Report 50-390, 391/93-16. In this report, the NRC described a CATD which had been closed although the corrective action plan had not been fully implemented. The intent of TVA's root cause and corrective action discussion was to indicate that the current ECSP closure process has been effective in resolving corrective action plan deviations. When corrective action plan deviations are identified, the current process ensures that they are properly approved before the CATDs are closed. Although other problems have been identified in CATD closures, the specific example cited is considered to be an isolated case of a CATD which was closed under the current process with an unidentified and unapproved corrective action plan deviation.

This conclusion is based on TVA's review of CATD closure procedures, NRC inspection results, and TVA QA audit results at WBN.

ENCLOSURE 3

LIST OF COMMITMENTS

1. TVA will perform a random sample of NCRs closed prior to March 1987, classified as not being significant, and which were dispositioned as rework, reject, or other. (NCRs dispositioned as repair or "use-as-is" were previously evaluated.) This review will determine whether NCRs in the sample population could have adversely affected the safe operation of the plant, if left uncorrected. This action is scheduled to be completed by August 31, 1993.
2. TVA will develop inspection criteria and perform a walkdown of those vendor wired safety-related electrical panels required for Unit 1 operation which were not previously included in the NCR W-205-F walkdown. This action is scheduled to be completed prior to turnover of the last affected electrical system to the operations staff.