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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

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WBRD-50-390/86-37
WBRD-50-391/86-36

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 - INADVERTENT OMISSION OF DRAWINGS
FROM ECNs - WBRD- 50-390/86-37, WBRD-50-391/86-36 - FINAL REPORT

The subject deficiency was initially reported to NRC-Region II Inspector Bob Carroll on March 20, 1986, in accordance with 10 CFR 50.55(e) as SCRs WBN EEB 8621 and EEB 8622 for units 1 and 2 respectively. Our interim report was submitted on April 18, 1986. Enclosed is our final report. We no longer consider this item to be reportable under 10 CFR 50.55(e).

If there are any questions, please get in touch with J. A. McDonald at (615) 365-8527.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley
R. Gridley, Director
Nuclear Safety and Licensing

Enclosure

cc (Enclosure):

Mr. James Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. G. G. Zech
Director, TVA Projects
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Records Center
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
INADVERTENT OMISSION OF DRAWINGS FROM ECNs
WBRD-50-390/86-37, WBRD-50-391/86-36
SCR WBN EEB 8621 AND SCR WBN EEB 8622
10 CFR 50.55(e)
FINAL REPORT

Description of Deficiency

As part of the generic review for a Bellefonte Nuclear Plant (BLN) problem identification report (PIR), TVA issued PIR WBN EEB 8604 for Watts Bar Nuclear Plant (WBN). The purpose of this PIR was to review engineering change notices (ECNs) involving the electrical engineering discipline in order to determine whether any documents affected by the scope of the ECN were omitted from the ECN data sheets and not revised before ECN closure. Ten ECNs were reviewed by the Watts Bar Engineering Project (WBEP) electrical group and two drawings from one of the 10 ECNs were found to have been inadvertently omitted from the ECN data sheet. The specific ECN involved was ECN 5745, and the two drawings omitted from the data sheet involved the installation of insulation on two sampling lines in non-safety-related systems. The insulation was for personnel protection from heat expected from the sampling lines and would not have rendered any system inoperable.

The failure to include all necessary drawings on an ECN data sheet is not in accordance with section 4.2.2.1 of Office of Engineering Procedure (OEP) OEP-11 and was caused by a human error; not a procedural deficiency. Because one of the 10 ECN packages sampled was not complete, the potential for the existence of an adverse trend with regard to incomplete ECNs was considered.

Safety Implications

SCR WBN EEB 3621 and SCR WBN EEB 8622 were issued to investigate a larger random sample of ECNs for safety systems that were all or partially safety related. Fifty eight ECNs were randomly selected for review using the Nuclear Construction Issues Group (NCIG) Sampling Plan NCIG-01RO.

Per the sampling program procedure developed in accordance with NCIG-01 RO the acceptance criteria for determining whether an unacceptable failure had occurred was:

1. The safety system would have been rendered incapable of performing its intended safety function and
2. It had not already been detected or it would not have been detected during the normal design and construction process prior to fuel loading.

Review results revealed that three ECNs had drawings omitted. Discussion of these omissions follows:

- ECN 3250 - One drawing was omitted but it was later revised by ECN 4275, before this review. This was a documentation change only and omission could not have rendered any safety system incapable of performing its function. ECN 3250 was issued February 9, 1982 and closed on May 26, 1982.

- ECN 4370 - One support drawing for unit 2 was omitted, but the Division of Nuclear Construction had already notified the Division of Nuclear Engineering of the omission before this review. Omission of this drawing would not have rendered the system incapable of performing its intended safety function. This ECN was issued November 16, 1983 and closed on July 15, 1985.
- ECN 5803 - Eight support drawings were omitted for unit 1. These involved documentation changes only and would not have rendered the safety system incapable of performing its intended safety function. This ECN was issued on July 9, 1985 and closed on August 15, 1985.

Based on the above discussion TVA has established that no adverse trend exists regarding the omitted drawings. This conclusion is based on the consideration of the following:

1. None of the omitted drawings represented an unacceptable failure as defined in the sampling program.
2. Only 10 out of approximately 1055 drawings involved in the review were omitted.
3. The omission of the drawings from the three ECNs represented a random distribution over a long period of time (over three years).

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