

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

September 24, 1982

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

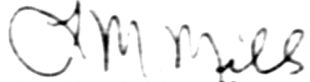
WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - NRC REGION II REPORT 50-390/82-18-03
AND 50-391/82-15 - FINAL RESPONSE TO VIOLATION 50-390/82-18-03,
50-390/82-15-03

The subject letter dated July 7, 1982 cited TVA with two violations. A final response to violation 50-390/82-18-01 and 50-391/82-15-01 and an interim report on violation 50-390/82-18-03 and 50-391/82-15-03 were submitted on August 20, 1982. Enclosure 1 is our final response to the subject violation. Enclosure 2 addresses related information requested in the inspection report.

If you have any questions, please get in touch with R. H. Shell at
PTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


L. M. Millis, 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

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ENCLOSURE 1
WATTS BAR NUCLEAR PLANT UNIT 1 AND 2
FINAL RESPONSE TO VIOLATION

Violation 50-390/82-18-03, 50-391/82-15-03

10 CFI 50, Appendix B, Criterion V requires activities affecting quality to be accomplished in accordance with instructions. The accepted QA program, FSAR section 17.1A commits to safety guide 28 which endorses ANSI N45.2-1971. Section 6 of the Standard contains the same requirements as does Criterion V of Appendix B. EP-1.26, section 5.2 requires the initiation of a nonconforming condition report for design deficiencies.

Contrary to the above, the licensee did not initiate a nonconforming condition report for recognized design deficiencies in diesel generator lube oil system drawings issued for construction under Engineering Change Notice 2856.

This is a severity Level V Violation (Supplement II).

Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

When TVA decided to implement the lube oil design change under Engineering Change Notice (ECN) 2856, TVA's Division of Engineering Design (EN DES) chose to use the manufacturer's drawing (1608R03001, Rev. A) to show the mechanical system design details. EN DES reviewers failed to consider during their review that the drawing was to be used by TVA's Division of Construction (CONST) for implementation of the design change and would therefore need to contain all information normally required by CONST.

The drawing was actually sufficient for its purpose had the vendor (Power Systems Division, Morrison-Knudson Company, Incorporated) been performing the work, due to the procedures and specifications available to Power Systems personnel. However, when CONST received the drawing and started reviewing it for their work package, it was determined that the drawing did not provide adequate information. Thinking the necessary information might be available elsewhere, CONST initiated Design Information Request (DIR) A-013. CONST did not feel a nonconformance report (NCR) was necessary at this time since they felt that the necessary information was available and since no work had yet been initiated.

When EN DES reviewed DIR A-013, they realized the drawing was incomplete and would require revision. At this time, a nonconformance was evident and an NCR should have been written. However, the personnel involved did not adequately understand the applicability of Engineering Procedure (EP) 1.26 to systems under a limited QA program.

Corrective Action Taken and Results Achieved

EN DES has initiated an NCR (WBN SWP 8251) to document this condition. The design drawing is being revised to provide the additional information required by CONST. The NCR documents the reasons for the design deficiency.

Actions Taken to Prevent Recurrence

The personnel involved were instructed in the application of EP 1.26 to limited QA systems on June 15, 1982. Also, EN DES has implemented a program to instruct all personnel in all procedures which affect their design work. This program is an ongoing effort.

Date When Full Compliance Will Be Achieved

Design changes will be completed by December 30, 1982.

The NRC Inspector additionally requested in his report that TVA address the continued misuse of DIRs. Below is our response to this request.

Response

As discussed in the "Reasons for the Violation" section above, CONST initiated DIR A-013 with the impression that the proper information was in fact available within TVA. EN DES returned the DIR to the site with the answers to CONST's questions. This is in accordance with EN DES policy as described in a memorandum from the Manager of EN DES which states in part:

"The DIR is intended to provide a written record of the CONST request and the EN DES response to problems requiring clarification or interpretation information from EN DES. The DIR can provide no authority for action outside the scope of issued drawings or procedures. Any design changes noted by DIR disposition must not be implemented until drawings are revised or Field Change Request (FCR) approval is obtained. Clarification on interpretation information may be used by CONST at the time the completed DIR is received.

Memoranda and the DIR are never intended to initiate design changes without the issuance of a controlled change document such as an Engineering Change Notice (ECN) or an FCR. Please reemphasize to your staff the importance of following the appropriate procedures when design changes are needed."

TVA initially intended to have Power Systems revise the affected drawing to show the required information. EN DES then decided to revise the drawing under ECN 3355 incorporating the information in DIR A-013. In the meantime, CONST had requested and received approval of Field Change Request (FCR) A-363 to begin work on one of the diesel generator systems. Therefore, no work was accomplished from the DIR.

Based on the above, TVA does not consider the handling of DIR A-013 in violation of EN DES policy or contradicting the commitments made in our response to violation 390/80-23-02, 391/80-17-02.