

2

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

July 20, 1984

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 - NRC-OIE REGION II INSPECTION  
REPORT 50-390/84-33, 50-391/84-28 - RESPONSE TO VIOLATIONS

The subject inspection report cited TVA with a Severity Level IV Violation (390,391/84-33,28-01) and a Severity Level V Violation (390,391/84-33,28-02) in accordance with 10 CFR 2.201. Enclosed is our response to the subject violations.

If you have any questions concerning this matter, please get in touch with R. H. Shell at FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*DS Kammer*

D. S. Kammer  
Nuclear Engineer

Enclosure

cc (Enclosure):

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

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2  
NRC-OIE REGION II INSPECTION REPORT  
50-390/84-33 AND 50-391/84-28  
RESPONSE TO VIOLATION

Severity Level IV Violation - - 390/84-33-01, 391/84-28-01

10 CFR 55.10(d) requires each application and statement shall contain complete and accurate disclosure as to all matters and things required to be disclosed.

10 CFR 55.10(a)(6) requires certification that the applicant has learned to operate the controls in a competent and safe manner and has need for an operator or senior operator license. This certification may be provided by an authorized representative of the facility licensee where the applicant's services will be utilized. The certification must include details on courses of instruction administered by the facility licensee, number of course hours, and the number of hours of training received at the facility.

Contrary to the above, in three instances inaccurate information was submitted by TVA as part of the required certification on applications for operator and senior operator licenses at the Watts Bar facility. However, if the correct information had been known at the time of the submittal, the license eligibility of the individual applicants would not have been affected.

Admission or Denial of Violation

TVA agrees with the violation as stated.

Reason for the Violation

Inaccurate information that existed on applications for operator and senior operator licenses, for the three instances, resulted from clerical errors and misinterpretation of what information was required in the NRC Form 398.

Corrective Steps Which Have Been Taken and the Results Achieved

Actions were taken to correct the inaccuracies as noted by the inspector in the report details.

Corrective Steps Taken to Avoid Further Violations

Knowledgeable operations personnel will perform an independent verification of completed NRC 398 forms.

Date When Full Compliance Will Be Achieved

Watts Bar is now in full Compliance.

Severity Level V Violation - - 390/84-33-02, 390/84-28-02

10 CFR 50, Appendix B, Criterion V, states that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Watts Bar Final Safety Analysis Report, Section 13.2.1.1.2, and Operating Section Letter (OSLT)-1 states, in part, that the progress of all participants (cold license candidates) in this program (Observation Training At Comparable Operating PWR plant) will be closely monitored by the training coordinator who will receive weekly reports of the time spent on particular systems for each week. The weekly time reports will be used to verify that all safety-related systems are studied during this program.

Contrary to the above, in two instances the required Observation Training Program Weekly time report systems were not documented as completed. Additionally, the aforementioned Operating Section Letter did not include appropriate criteria for determining that observation training objectives were accomplished.

Admission or Denial of the Alleged Violation

TVA agrees with the violation as stated.

Reason for the Violation

Participants of the Observation Training Program did not fully understand the basis nor importance of maintaining accurate reports of the time spent on particular systems each week. Supervision was remiss in not ensuring all forms were appropriately and completely filled in when submitted.

Corrective Steps Which Have Been Taken and the Results Achieved

The two instances noted in the NRC Report as well as all other WBN participants that underwent Observation Training At A Comparable Operating PWR plant were reevaluated for deficient entries of time spent. For those discrepancies discovered other documentation, such as journal entries and time sheets, which will verify the candidates had availability to specific training will be retrieved and be made available for review.

Corrective Steps Taken to Avoid Further Violations

In the future all cold license candidates who enter offsite observation training will be provided system checkoff sheets and a briefing on the reason and importance of properly completing all forms. The system observation checkoff sheet has been revised to include a space to be initialed by an on duty reactor operator at the offsite facility to attest that the stated training did occur. A provision for an SE/SRO to review the checkoff sheet for satisfactory overall completion was also added.

Date When Full Compliance Will Be Achieved

Documentation to support candidate training at the offsite facility will be on file by September 21, 1984.