# TENNESSEE VILLEY AUTHORITY

CHATTANOOGA. TENNESSEE 37401 400 Chestnut Street Tower II

November 10, 1980

of the line

Mr. James P. O'Reilly, Director Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission Region II - Suite 3100 101 Marietta Street Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Enclosed is our response to C. E. Murphy's October 16, 1980, letter, RII:WBS 50-518/80-18, -519/80-17, -520/80-18, -521/80-16 regarding activities at our Hartsville Nuclear Plant which appeared to have been in violation of NRC regulations. If you have any questions regarding this subject, please call Jim Domer at FTS 857-2014.

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Very truly yours,

TENNESSEE VALLEY AUTHORITY

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L. M. Mills, Manager Nuclear Regulation and Safety

Enclosure

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## ENCLOSURE RESPONSE TO NRC-OIE LETTER FROM C. E. MURPHY TO H. G. PARRIS DATED OCCOBER 16, 1980

Please reference RII:WBS 50-518/80-18, 50-519/80-17, 50-520/80-18, and 50-521/80-16.

This report responds to the Notice of Violation described in Appendix A of the OIE inspection report referenced above. This is the final report on the subject noncompliance.

## Noncompliance Item - Infraction 518, 519, 520, 521/80-18-01

As required by 10CFR, Appendix B, Criterion V, and implemented by PSAR Section 17.1A.5, activities affecting quality are prescribed by procedures and are accomplished in accordance with these procedures. PSAR Section 17.1A.6 further requires control of document procedures and drawings. Drawing control procedure CEP 6.01, R7, requires in part that obsolete prints or their title blocks be returned to the document control room upon receipt of revised prints. Criterion XVI, as implemented by PSAR Section 17.1A.16, requires correction of condition adverse to quality.

Contrary to the above, obsolete drawings identified by the licensee's audit HT-G-80-12 Drawing Control on July 30, 1980, had not been returned to the document control rooms. Corrective measures to preclude use of obsolete drawings were not effective in that some of the obsolete drawings identified in the audit had not been returned as of August 21, 1980, to the document control room.

#### Response

### 1. Corrective Steps Taken and Hesults Achieved

The files containing the 30 drawings identified in the audit (HT-G-80-12) deficiency were updated by DCU to include the current revisions as of August 22, 1980. TVA's Hartsville Document Control Unit (DCU) generated a list (by computer) of all drawings currently in use and the current revision. This list is now being updated on a daily basis by using the TVA drawing receipt forms processed each day. The rest of the drawing files onsite were corrected from copies of the master list which were sent to each craft and engineering unit (with instructions to make necessary corrections). Superseded drawings were removed from files and the correct revisions of the drawings issued to the field by September 26, 1980, except for one area which was inadvertently omitted during the initial followup. A similar list of drawing change requests (FCR's and ECN's) was made, distributed, and the necessary updates made by October 3, 1980. As of October 8, 1980, no superseded drawings were in use at Hartsville. TVA CONST QA performed a survey of 133 drawings in various project locations on October 8, 1980, and found no nonconforming conditions.

### 2. Corective Steps Taken to Avoid Further Noncompliance

In order to prevent recurrence of this condition, DCU will use the list discussed above to conduct a monthly survey of drawing files including all QC files and 1/3 of all other site drawing files on a rotating basis. This method will ensure that all site drawing files have been reviewed on a quarterly basis. The first postaudit drawing survey is currently underway. Also, memorandums have been sent from the Construction Project Manager to the Construction Superintendent and from the Construction Engineer to site engineering and QC units stressing the necessity of using upto-date drawings and requesting that all drawing holders be informed accordingly.

### 3. Date When Full Compliance Was Achieved

Full compliance was achieved by October 8, 1980.