

TENNESSEE VALLEY AUTHORITY

NUCLEAR SAFETY REVIEW STAFF

NSRS INVESTIGATION REPORT NO. I-85-517-BFN

SUBJECT: CARS AT BROWNS FERRY NOT PROMPTLY ISSUED

DATES OF INVESTIGATION: OCTOBER 10-16, 1985

INVESTIGATOR: C. E. Chmielewski 2-25-86  
C. E. CHMIELEWSKI DATE

REVIEWED BY: MW Alexander 2/26/86  
M. W. ALEXANDER DATE

APPROVED BY: W.D. Stevens 3/4/86  
W. D. STEVENS DATE

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PDR

## I. BACKGROUND

This report documents the investigation of an employee concern received by the Nuclear Safety Review Staff (NSRS) which stated that, "Corrective Action Reports (CARs) at Browns Ferry Nuclear Plant (BFN) are not being issued in a timely manner after being submitted by the initiator." The documented concern also indicated the condition "can be attributed to the fact that the NQAM, Part II, Section 7.2, does not provide a requirement for timeliness."

## II. SCOPE

- A. The scope of this investigation was developed from the stated concern of record and included the following details received from the Concerned Individual (CI):
1. The NQAM, Part II, Section 7.2, does not provide specific timeliness requirements for issuance of a CAR once a problem has been identified.
  2. CARs at BFN are not being issued in a timely manner after being submitted by the initiator.
  3. Untimely issuance of CARs is contrary to 10CFR50, Appendix B, Criterion XVI, which requires prompt identification and correction of conditions adverse to quality.
- B. The NQAM was reviewed against TVA licensing commitments and requirements. BFN site instructions dealing with CARs were reviewed for adequacy in meeting these upper-tier requirements. The CAR logs and files were reviewed and the times required for CAR issuance recorded and trended. Finally, the CAR issuance process was discussed with quality assurance and line organization personnel to determine the general understandings of the purpose of the issuance controls. These discussions included the chief of the site QA staff and a plant superintendent.

## III. SUMMARY OF FINDINGS

### A. Requirements and Commitments

1. 10CFR50, Appendix B, Criterion XVI, requires that:

"Measures shall be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

2. Regulatory Guide 1.33 R2 endorses ANSI N18.7-1976 as an acceptable standard for meeting quality assurance requirements of 10CFR50, Appendix B, during operation. The TVA Quality Assurance Topical Report, TVA-TR75-1A, commits TVA to meet this standard. Section 5.2.11 of ANSI N18.7 requires failures, malfunctions, deficiencies, deviations, defective material and equipment, abnormal occurrences, and nonconformances to be promptly identified and corrected.

#### B. Findings

1. Review of the NQAM against the requirements indicated that CARs are addressed under Part III, Section 7.2. The stated concern erroneously identified Part II, Section 7.2. The review also indicated that subparagraph 1.1 of NQAM, Part III, Section 7.2, does specify requirements for prompt identification and documentation; however, detailed procedures on how prompt identification and documentation are carried out similar to those for handling once the CAR is issued are not contained in NQAM, Part III, Section 7.2.
2. A review of CAR logs and files maintained at the BFN site was performed using data from 63 CARs processed in 1985. Approximately two-thirds of those CARs were found to have been issued in less than seven days after identification, on the average. However, the remaining one-third required an average of 42 days before issuance, with two CARs taking 100 days or more.
3. Discussions with cognizant plant QA staff personnel indicated that there was an awareness of the problem within the plant QA staff. The following factors were described by the QA staff personnel as contributors to the problem:
  - a. There is no proceduralized time requirement which forces priority.
  - b. The requirement of Browns Ferry Site Director Standard Practice BF-SDSP-3.1 that the QA Staff Supervisor, or designee, discuss the CAR with cognizant management before issuance has led to delays.
  - c. There is a lack of clear and uniform understanding regarding the purpose of this preissuance discussion.
  - d. The Management Appraisal System (MAS) goals establishing line management performance measurements based on numbers of CARs issued combined with no clear purpose for the preissuance discussion creates incentive for managers to request additional time to research and confirm the problem documented on the CAR.
  - e. Loss of continuity on issuance status of some CARs occurs due to QA staff vacation schedules.

4. Several members of plant line management and QA staff were interviewed regarding the purpose of the preissuance discussions of the CARs. Somewhat differing views of the purpose were expressed. Review of BF-SDSP-3.1 R1 confirmed that the purpose is not defined.

## V. CONCLUSIONS AND RECOMMENDATIONS

### A. Conclusions

1. Detail II.A.1 of the concern was not substantiated. The NQAM does contain the general requirement for prompt identification and documentation of conditions adverse to quality.
2. Details II.A.2 and II.A.3 of the concern were substantiated. However, the BFN plant QA staff has already initiated corrective action with the issuance of Section Instruction Letter QA-SIL-5.04 R0 during the inquiry. This instruction provides guidance to the QA staff regarding the purpose of the preissuance discussion of a CAR with affected management and specifies that if "contact with the responsible line supervisor cannot be made by the end of the next working day" the CAR will be initiated "without the discussion." It is believed that, if adequately implemented, the changes defined in QA-SIL-5.04 should ensure CARs at BFN are issued in a timely manner after being submitted by the initiator. No further action is recommended.

### B. Recommendations

None

DOCUMENTS REVIEWED IN INVESTIGATION I-85-517-BFN  
AND REFERENCES

1. TVA Quality Assurance Topical Report, TVA-TR75-1A R8, Table 17D-3, Item F
2. ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," Section 5.2.11
3. NQAM, Part III, Section 7.2, Revision 10-12-84, as further revised by a Quality Notice dated April 10, 1985, "Corrective Action," Paragraph 4.3.3
4. Browns Ferry Site Director Standard Practice BF-SDSP-3.1 R1 "Corrective Action Program"
5. Browns Ferry Plant Quality Assurance Staff, Section Instruction Letter 7.3, Revised 10-16-84, "Processing and Tracking Corrective Action Reports (CARs) and Discrepancy Reports (DRs)"
6. Browns Ferry Plant Quality Assurance Section Instruction Letter 5.04 R0 dated July 1, 1985, but just issued in October 1985 (replaces reference 5), "Processing and Tracking Discrepancy and Corrective Action Reports"

UNITED STATES GOVERNMENT

Memorandum

TENNESSEE VALLEY AUTHORITY

TO: W. C. Bibb, Site Director, Browns Ferry Nuclear Plant

FROM: K. W. Whitt, Director of Nuclear Safety Review Staff, E3A8 C-K

DATE: MAR 05 1986

SUBJECT: NUCLEAR SAFETY REVIEW STAFF INVESTIGATION REPORT TRANSMITTAL

*RPD -*  
 WATTS BAR  
 NUCLEAR PLANT  
 SITE DIRECTOR'S OFFICE  
 MAR 06 '86

Transmitted herein is NSRS Report No. I-85-517-BFN

Subject CARS AT BROWNS FERRY NOT PROMPTLY ISSUED

Concern No. N/A

	Note	Action	Reply
Mr. Bibb			
Mr. Whitt			
Mr. C. Bibb			
Mr. E. Bibb			
Mr. G. Bibb			
Mr. H. Bibb			
Mr. I. Bibb			
Mr. J. Bibb			
Mr. K. Bibb			
Mr. L. Bibb			
Mr. M. Bibb			
Mr. N. Bibb			
Mr. O. Bibb			
Mr. P. Bibb			
Mr. Q. Bibb			
Mr. R. Bibb			
Mr. S. Bibb			
Mr. T. Bibb			
Mr. U. Bibb			
Mr. V. Bibb			
Mr. W. Bibb			
Mr. X. Bibb			
Mr. Y. Bibb			
Mr. Z. Bibb			

No response or corrective action is required for this report. It is being  
 transmitted to you for information purposes only. Should you have any  
 questions, please contact W. D. Stevens at telephone 6231.

Recommend Reportability Determination: Yes        No X

*W.D. Stevens*  
 Director, NSRS/Designee

- WDS:GDM  
 Attachment  
 cc (Attachment):  
 H. L. Abercrombie, SQN  
 W. T. Cottle, WBN  
 James P. Darling, BLN  
 R. P. Denise, LP6N40A-C  
 G. B. Kirk, SQN  
 D. R. Nichols, E10A14 C-K  
 QTC/ERT, Watts Bar Nuclear Plant  
 Eric Sliger, LP6N48A-C  
 J. H. Sullivan, SQN



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