

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower, II

SEP 28 10:44

September 24, 1979

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

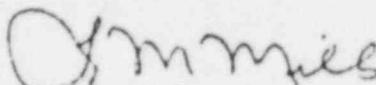
Dear Mr. O'Reilly:

Enclosed is our response to C. E. Murphy's August 13, 1979, letter, RII:WPK 50-553/79-12, regarding activities at the Phipps Bend Nuclear Plant which appeared to have been in violation of NRC regulations.

We have reviewed the subject inspection report and find no proprietary information in the report. If you have any questions regarding this matter, please call Tish Jenkins at FTS 854-2014.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE

FINAL RESPONSE TO NRC-OIE LETTER
FROM C. E. MURPHY TO H. G. PARRIS DATED
AUGUST 13, 1979

(REFERENCE RII:WPK 50-553/79-12)

This report responds to the following Notice of Violation described in Appendix A of OIE Inspection Report RII:WPK 50-553/79-12. This is the final report on the noncompliance.

Noncompliance Item - Infraction (553/79-12-01)

As required by 10 CFR 50, Appendix B, Criterion VI, and as implemented by the PSAR Paragraph 17.1A.6 and Table II of TVA "OEDC-QA Program Requirements Manual", measure shall assure that documents be reviewed and approved. Rockwell International "Quality Assurance Program Plan for Preservice and Inservice Inspection Programs", N001PP 100-017, Rev. C, paragraph numbers 11.2.1. and 15.2.1 require an approved inspection plan to be used.

Contrary to the above, on August 9, 1979, Rockwell International was inspecting the reactor pressure vessel in accordance with an informal inspection plan not approved by TVA.

This is an infraction.

RESPONSE

The noncompliance item described in the subject inspection report was previously identified as a finding in a TVA audit by the Office of Power Quality Assurance and Audit Staff (OPQAAS) on July 19, 1979. The audit revealed that "no plan was available at the time of the audit" and that "a draft of the plan was being prepared at the time of departure." The followup audit on August 1, 1979, revealed that "the inspection plan generated as a result of this audit is not adequate to meet contract and ASME Section XI requirements." TVA was in the process of correcting this deficiency at the time of the NRC inspection.

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The baseline inspection program is not considered a function of TVA's Office of Engineering Design and Construction. The baseline inspection and inservice inspection program is prepared and controlled by the Office of Power, Power Plant Maintenance Branch as defined by Part II, Section 5.1 of the Operational Quality Assurance Manual.

1. Corrective Steps Taken and Results Achieved

Rockwell International has submitted their proposed plan to TVA for review and approval. TVA is in the process of reviewing the proposed plan. The plan will be reviewed to verify that contract and ASME requirements are satisfied. TVA plans to complete the review and approval of the plan by November 2, 1979. A followup audit will be performed by the OPQAAS to verify implementation of the plan by Rockwell International. The followup inspection will be performed during the completion of the baseline inspection.

2. Action Taken to Prevent Recurrence

Implementation of the approved plan will prevent recurrence of inspections without an approved plan. TVA plans to make more stringent reviews of the specifications required and defined in contracts associated with baseline inspections.

3. Date When Full Compliance Will Be Achieved

Full compliance will be achieved on or before November 2, 1979, by implementation of a reviewed and approved inspection plan.

TVA will ensure that the work already performed follows the inspection plan as approved by TVA. Since the inspections were performed using procedures approved by TVA, we do not believe the validity of the work already performed to be in question because of this noncompliance item.