

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

April 1, 1981

HTRD-50-518, -519, -520, -521/81-04
PBRD-50-553/81-06, -554/81-04

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:

HARTSVILLE AND PHIPPS BEND NUCLEAR PLANTS - COMPLETION OF AS-BUILT
DRAWINGS - HTRD-50-518, -519, -520, -521/81-04 AND
PBRD-50-553/81-06, -554/81-04

The subject deficiency was initially reported to NRC-OIE, Region II, Inspector R. W. Wright on January 22, 1981, as NCR's HTN-M80-10 and PBN-M80-10, deficiency Nos. 13, 14, and 21. The first interim report was submitted on February 23, 1981. In compliance with paragraph 50.55(e) of 10 CFR Part 50, we are enclosing the final report on deficiency 13, and the second interim report on the deficiencies 14 and 21. TVA anticipates transmitting the final report on or before June 30, 1981. If you have any questions, please call Jim Domer at FTS 857-2014.

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
HARTSVILLE AND PHIPPS BEND NUCLEAR PLANTS
COMPLETION OF AS-BUILT DRAWINGS/DESIGN CONTROL
HTRD 50-518, -519, -520, -521/81-04
PBRD-50-553/81-06, -554/81-04
10CFR50.55(e) REPORT NO. 2 (FINAL) DEFICIENCY 13, (INTERIM)
DEFICIENCIES 14 AND 21

M80-10 DEFICIENCY 13 (FINAL RESPONSE)

Description of Deficiency

The requirements for as-constructed drawings as stated in Interdivisional-Quality Assurance Procedure (ID-QAP) 6.1, RO, have not been translated into Construction Engineering Procedures (CEP's) in order to establish the data base required to systematically document the "as-constructed" STRIDE design for Hartsville and Phipps Bend Nuclear Plants.

Safety Implications

This condition could result in plant and design personnel performing work on safety-related systems with drawings which do not reflect all changes, and might therefore lead to a situation which could endanger the safe operation of the plant.

Corrective Action

TVA is currently revising Construction Engineering Procedures CEP-15.01, "Control of Quality Control Investigation Reports" and CEP-15.03, "Control of Nonconformance Reports" to resolve this deficiency. These revisions will ensure that the information entered on the report is sufficient to provide recipients of the report with a clear and accurate description of the nonconformance and corrective action(s) being taken or proposed. This will also ensure that the report recipients have sufficient detail to produce the as-constructed drawings and, hence, prevent recurrence of this deficiency. The revision to CEP-15.01 and CEP-15.03 will be issued by April 30, 1981.

M80-10 DEFICIENCY 14 (INTERIM RESPONSE)

Description of Deficiency

The requirements as stated in Interdivisional-Quality Assurance Procedures (ID-QAP) 6.1, R0, and 2.2, R3, call for as-constructed drawings to be complete on or before preoperational testing and transfer of these systems to NUC PR. Contrary to these requirements, GE/C. F. Braun contracts call for the as-built drawings to be completed after the 300-hour test. Also, contrary to 10CFR50, Appendix B, Criterion XVI, "Corrective Action," the Nuclear Engineering Branch failed to promptly identify and document these nonconforming conditions.

Interim Progress

TVA has no further progress to report on this matter. We are continuing our investigation into this matter and anticipate supplying the NRC with a final report on or before June 30, 1981.

M80-10, DEFICIENCY 21 (INTERIM RESPONSE)

Description of Deficiency

Contrary to ANSI N45.2, "QA Program Requirements," some design changes as identified on Field Change Requests (FCR's) for General Electric are not incorporated into drawings until "as-constructed" drawings are completed after the 300-hour test. Therefore, the Design Project Organization personnel are not performing their activities per current drawings.

Interim Progress

TVA has received GE's corrective actions on this deficiency. We are currently evaluating these corrective actions and anticipate forwarding the results of this evaluation to the NRC in the form of a final report on or before June 30, 1981.