

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority  
Watts Bar 1

Docket No. 50-390  
License No. CPPR-91

During the Nuclear Regulatory Commission (NRC) team inspection conducted on February 13-17, 1989, at Sargent & Lundy's office in Chicago Illinois, a violation of NRC requirements was identified. The violation involved failure of TVA to properly document and issue "Condition Adverse to Quality Reports (CAQR)." In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C (1989), the violation is listed below:

10 CFR Part 50, Appendix B, Criterion II as implemented by TVA's Quality Assurance (QA) Topical Report, TVA-TR75-1A, Revision 10, Section 17.1, "QA Program Applicable to Design and Construction Quality Assurance Program", requires that the applicant establish and implement a QA program that is documented and conducted in accordance with written procedures.

QA Topical Report Table 17E-1 states that the Nuclear Quality Assurance Manual (NQAM) delineates responsibilities, requirements, and commitments for the QA Program during design and construction.

NQAM Part 1, Section 2.16, Revision 4, "Corrective Action", Paragraph 2.1 requires that items discovered during installation or in-process work activities that require repair or accept-as-is disposition or failure of the approved design to comply with engineering input documents, licensing, or regulatory commitments, be documented and issued on a CAQR. Further, Paragraph 2.13, of the NQAM, "Evaluation for Effect on Plant Operability" requires that if a management reviewer determines that a CAQR potentially affects operability of a nuclear unit, a copy of the CAQR shall be immediately sent to the affected site.

Contrary to the above, for the five examples listed below, the CAQR process was not properly implemented, in that:

- a. Vertical Slice Review (VSR) discrepancy numbers DR-95 and 430 identified nonconformances in mounting Bailey Meter clamp bars needed to meet seismic requirements. These nonconformances were documented on a CAQR but were inappropriately reviewed and dispositioned with respect to its impact on TVA operating sites. The failure to properly review and disposition this CAQR resulted in a two-month notification delay to an operating plant (Sequoyah) which was affected and subsequently entered a Technical Specifications Action Statement to implement corrective actions.

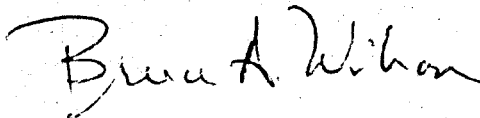
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- b. A VSR identified discrepancy, number DR-437, involving grouted anchor spacings which do not conform to General Construction Specification G-32, was not documented by the licensee on a CAQR as required.
- c. A VSR identified discrepancy, number DR-587, involving motor operator valve positions which deviate from the design drawings, was not documented by the licensee on a CAQR as required.
- d. A VSR identified discrepancy, number DR-134, involving D.C. battery charger breaker status not being provided in the control room as stated in the FSAR and SER, was not documented by the licensee on a CAQR as required.
- e. A VSR identified discrepancy, number DR-104 documents discrepancies that not all loads on the subject floor slab were considered. Also TVA stated in their Resolution Report that these discrepancies were documented in CAQR-WBN 880786. This CAQR fails to document these discrepancies.

This is a Severity Level IV (Supplement II) and applies to Unit 1.

Pursuant to 10 CFR 2.201, TVA is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Associate Director for Special Projects, Office of Reactor Regulation, and copy to the NRC Resident Inspector, Watts Bar, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) admission or denial of the violation; (2) the reason for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION



Bruce A. Wilson, Assistant Director  
for Inspection Programs  
TVA Projects Division  
Office of Nuclear Reactor Regulation

Dated at Atlanta, Georgia  
this 2<sup>nd</sup> day of May 1989