## APPENDIX A

## NOTICE OF VIOLATION

Tennessee Valley Authority Watts Bar

Docket Nos. 50-390 & 50-391 License Nos. CPPR-91. & CPPR-92

As a result of the inspection conducted on December 1-31, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

A. 10 CFR 50, Appendix B, Criterion V requires activities affecting quality to be accomplished in accordance with instructions. The accepted QA program, FSAR Section 17.1A.5, states that assurance is provided that activities are accomplished in accordance with these instructions. Section 5.2 WBNP-QCP-1.2, Control of Nonconforming Items, requires engineering personnel to assure identification of nonconforming items by initiating Nonconforming Condition Reports.

Contrary to the above, as of December 29, 1980, engineering personnel had not initiated a Nonconforming Condition Report for  $\frac{1}{2}$ " ID carbon steel safety related piping which supports operation of the Essential Raw Cooling Water pumps. This condition had been observed by the licensee on or about November 12, 1980.

This is a Severity Level V Violation (Supplement II.E).

B. 10 CFR, Appendix B, Criterion XVI, requires measures to assure that conditions adverse to quality are corrected. The accepted QA program, FSAR Table 17.1A-1, provides for corrective action to be implemented per OEDC-QAP-16.0, Corrective Action. Attachment 1 to OEDC-QAP-16.0 assigns the Division of Engineering Design (DED) responsibility for correction of DED conditions adverse to quality. The Essential Raw Cooling Water (ERCW) System Corresion/Constriction Study (MEB 780104021) identified that flow through one-half inch diameter carbon steel lines in the ERCW system would become completely constricted by corrosion.

Contrary to the above, as of December 30, 1980, measures did not assure the correction of the identified corrosion/constriction of ERCW piping in that no corrective action was taken or proposed for the one-half inch diameter carbon steel piping supplying prelube and motor cooling water to the ERCW pumps.

This is a Severity Level V Violation (Supplement II.E.).

C. 10 CFR 50, Appendix B, Criterion V, states that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with those procedures. FSAR Section 17.1A.V states that activities affecting quality are prescribed by procedures. TVA Process

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Specification 3.M.1.1(c), Non Destructive Examination, Section 11.1, requires that examined areas be cleaned by wiping with cloth or paper, following by wiping with cloth or paper saturated with acetone, isopropyl alcohol, or penetrant remover which meets requirements of paragraph 5.2.

Contrary to the above, as of December 30, 1980, procedures for an activity affecting quality were not followed in that six welds inspected on safety related piping in Unit 1 containment had not been cleaned as required.

This is a Severity Level V Violation (Supplement II.E.).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations 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. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

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