

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bars 1 and 2

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

As a result of the inspection conducted on November 1-30, 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 that activities affecting quality be prescribed by instructions and accomplished in accordance with those instructions. FSAR Section 3.2.2.7 identifies portions of the Heating Ventilation and Air Conditioning systems identified below as being safety related. The accepted QA program, FSAR Section 17.1A.5 states that assurance that activities are accomplished in accordance with instructions is provided by control of documents. Quality assurance staff procedure (QASP) 7.4 requires implementation of stop work action by Quality Assurance personnel in accordance with applicable project procedures. Watts Bar Quality Control Instruction 1.32 states that work will be stopped when an activity is identified as a condition which if allowed would affect the end use of the item or safe operation of the nuclear plant.

Contrary to the above, as of December 5, 1980, activities were not accomplished in accordance with instructions in that stop work action was not issued by the site Quality Assurance Unit or line management for the following quality assurance audit deficiencies:

1. WB-G-80-02 identified that fabrication and testing of all safety-related Heating Ventilation and Air Conditioning systems was being performed without quality assurance.
2. WB-M-80-07 identified operation of safety related air handling unit motors without preventive maintenance.

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

- B. 10 CFR 50.55(e) requires the holder of a construction permit to notify the Commission within 24 hours of each deficiency found in design and construction, which, were it to remain uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant, and which represents a significant breakdown in any portion of the quality assurance program in accordance with the requirements of Appendix B.

Contrary to the above, as of December 5, 1980, the Commission was not notified within 24 hours of a deficiency which represented a breakdown in a

810 4030 773

portion of the quality assurance program in that a 50.55(e) report was not made of deficient control and alarm wiring terminations in Diesel Generator 1AA identified in Nonconforming Condition Report W-20-P.

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

- C. 10 CFR 50, Appendix B, Criterion XVIII, requires the designated audit group to take followup action as indicated in deficient areas. The accepted QA program, FSAR Section 17.1A.18, states that audits of activities are performed periodically. Quality Assurance Staff Procedure (QASP) 7.1, Section 10 requires the auditor to verify that the corrective action on the deficiency sheet has been implemented or completed before closing the deficiency.

Contrary to the above, as of December 5, 1980, the audit group did not take followup action in that site QA audits WB-M-79-10 deficiency No. 2, and WB-G-80-11 deficiency No. 1, were closed prior to the implementation or completion of corrective action.

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

- D. 10 CFR 50, Appendix B, Criterion V requires activities affecting quality to be prescribed by instructions and accomplished in accordance with those instructions. The accepted QA program, FSAR Section 17.1A.5, states that activities affecting quality are accomplished in accordance with instruction. Watts Bar Quality Control Procedure (QCP) 1.6, Section 5.2.10, requires responsible engineering unit representatives to control items from the time of warehouse issue until assigned to another TVA division.

Contrary to the above, as of December 5, 1980, activities affecting quality were not accomplished in accordance with instructions in that ten shock arrestors withdrawn from warehouse storage for use in safety related systems were found uncontrolled outside Reactor Building No. 2 and were not provided the designated Level "C" storage environment.

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

- E. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions and that these activities be accomplished in accordance with these instructions. The accepted QA program, FSAR Section 17.1A.5, states that assurance that activities are accomplished in accordance with instructions is provided. The Office of Power Quality Assurance Manual (OQAM), Part II Section 2.1, states that the plant preventive maintenance program shall provide for a preventive maintenance schedule which described the time and type of maintenance to be performed.

Contrary to the above, as of November 6, 1980 activities affecting quality were not prescribed by documented instructions in that the mechanical preventative maintenance program did not specify maintenance instructions

for valves and the electrical preventative maintenance program did not specify maintenance instructions for components for several safety related systems, including the residual heat removal system.

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

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.

Date: ~~_____~~ FEB 13 1981