APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar 1 and 2

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

As a result of the inspection conducted on February 1 thru March 18, 1981, 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 II, requires that the quality assurance program provide control over activities affecting the safety functions of components. The accepted QA program, FSAR section 17.1A.2.1 states that the program provides control over activities affecting quality. The program applies to the components identified in the Safety Analysis Report to an extent consistent with importance to safety. Additionally, FSAR Table 3.2-2a identifies the Essential Raw Cooling Water (ERCW) pump as safety related.

Contrary to the above, as of March 18, 1981, the quality assurance program did not provide control over activities affecting quality in that the design, construction and testing of the Essential Raw Cooling Water pump motor cooler's freeze protection was not in the program.

This is a Severity Level IV Violation (Supplement II.D.1.).

B. 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.

1. Westinghouse Field Change Notice (FCN) Wat 10529 and WBT 10521, Upper Head Injection Valve Modifications, required that the valve downstream disc have weld metal added to correct for body seat metal removal. The FCNs also required the work to be performed under the direction and supervision of an Anchor/Darling representative.

Contrary to the above, as of March 18, 1981, downstream valve discs did not have weld metal added in accordance with the FCNs. Also, the assigned Anchor/Darling representative did not direct and supervise the valve seat modifications for six of the eight valves.

2. WBNP-QCP-1.6, section 6.6.2, required a responsible engineer during receipt inspection to ensure that all required records accompanying or preceding material to the project were complete and comply with contractual requirements.

Contrary to the above, as of March 18, 1981, repair, inspection and testing records completed as a result of FCNs WAT 10529 and WBT 10521, were not reviewed to ensure they complied with contractural requirements.

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3. FCN WBT 10521, required a Westinghouse Quality Control release prior to shipment of the reworked valves from Anchor/Darling.

Contrary to the above, as of March 18, 1981, a Quality Control release was not provided on the reworked valves.

This is a Severity Level V Violation (Supplement II.E.). Items similar to B.2, have been brought to your attention as items A.1. and A.4., in our letter of June 20, 1980, as items A., B., C., D., and F.2., in our letter of August 14, 1980, and as items A.2., A.3., and B.1., in our letter of October 9, 1980.

C. 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 March 18, 1981, engineering personnel had not initiated a Nonconforming Condition Report for the sandy textured contamination in the oil systems of the Unit 1 and 2 steam driven auxiliary feedwater pumps.

This is a Severity level V Violation (Supplement II.E.). Similar items have been brought to your attention as item A.4. in our letter of June 20, 1980, item F.2., in our letter of August 14, 1980, and as item A., in our letter of March 10, 1981.

D. 10 CFR 50, Appendix B, Criterion XII, requires measures to be established to ensure that instruments used in activities affecting quality are properly adjusted to maintain accuracy within necessary limits. The accepted QA program, FSAR section 17.1A.12, states that instruments are adjusted according to written procedures.

Contrary to the above, as of March 18, 1981, measures were not established to adjust instruments, in that formal requirements did not exist for instrument adjustment to compensate for elevation effects for preoperational test program instrumentation. The results of the Upper Head Injection preoperational test were misinterpreted due to lack of instrument level compensation.

This is a Severity Level V Violation (Supplement II.E.) applicable to Unit 1.

E. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be documented by instructions and shall be accomplished in accordance with those instructions. FSAR, section 17.1A.5, states that activities affecting quality are prescribed by documented instructions. Watts Bar Quality Control Instruction (WBNP-QCI)-1.39, section 6.2.6.5,

states that fire doors will be inspected according to WBNP-QCP 2.18, "Inspection of Mechanical Doors, Hatches, and Manways." WBNP-QCP-2.18 applies to all doors installed by TVA forces within the scope of the Quality Assurance Program and requires that completed documentation be sent to the Quality Control and Records unit for storage.

Contrary to the above, as of March 18, 1981, activities affecting quality were not accomplished in accordance with instructions in that no inspection documentation of installed fire doors had been completed.

This is a Severity Level VI Violation (Supplement II.F.) applicable to Unit 1.

Pursuant to the provisions of 10 CFR 2.201, you are 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: MAY 1 4 1981