APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar 1 and 2

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

As a result of the inspection conducted on March 17-10, 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 and the accepted QA program described in the FSAR Section 17.1A.2.2 requires the applicant to establish a quality assurance program at the earliest practicable time, consistent with the schedule for accomplishing the activities and that the program shall be documented by written procedures which provide control measures for activities related to quality which were prepared and made available prior to the scheduled performance of the activities.

Contrary to the above, duct work and piping for safety-related HVAC systems and portions of other HVAC systems described in TVA's General Design Criteria WB-DC-40-36.1 and Contract Specification No. N3G-881 received no quality assurance program in the areas of procurement, identification and control of material, fabrication, installation, inspection, testing and the documentation of such activities for all work accomplished prior to July 2, 1980.

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

B. 10 CFR 50.55, paragraph (e), Conditions of Construction Permits, requires the holder of a construction permit to notify the Commission within 24 hours and submit a written report within 30 days on each reportable deficiency found in design and construction, which, were it to have remained 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 conducted in accordance with the requirements of Appendix B.

Contrary to the above, significant deficiency No. 1 identified in site QA Audit No. WB-G-80-02 concerning the site not having procedures to document the field fabrication and installation of safety-related HVAC assemblies was improperly evaluated, and inappropriately determined not reportable by TVA on January 31, 1980 in that a major portion of this safety-related work had already been installed by that date without a QA program being in place to control the work.

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TVA reevaluated the subject deficiency approximately one year later and notified RII that this item was reportable on February 4, 1981, along with another similar site audit deficiency found in Audit No. WB-G-81-03.

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

C. 10 CFR 50, Appendix B, Criterion V as implemented by FSAR Section 17.1A.5 requires that activities affecting quality be accomplished in accordance with documented procedures. QC Procedures 3.5, Revision 11 and 3.3, Revision 10 are the instructions used for the installation and inspection of safety-related cables and exposed rigid conduit.

On March 19, 1981, activities affecting quality were not accomplished in accordance with documented procedures as follows:

1. QCP-3.5 requires that electrical cables be installed in raceways as detailed on pull slips and as designated in the procedure.

   Contrary to the above, cable number 0-3V-31-2147-A was routed through conduit 0VC963A and not conduit 0VC964A as required by the cable pull slip.

2. QCP-3.3 requires that all rigid and flexible conduit, boxes, fittings and accessories be installed in accordance with approved drawings issued by EN DES and Construction Specification G-40.

   Contrary to the above, conduit Number 2VC1123B was incorrectly identified as 2VC1124B and was not in accordance with EN DES conduit and grounding Drawing Number 45N820-4.

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

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: APR 29 1981