

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 20 through April 20, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. 10CFR50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality, such as nonconformances, are corrected. The accepted QA Program, FSAR 17.1A.16, states that procedures provide for the correction of adverse conditions.

Contrary to the above, as of April 16, 1981, measures to assure correction of conditions adverse to quality have not been established in that no corrective action was taken or planned as a result of Non-Conforming Condition Report (NCR) 2793. This NCR identified that no approval had been obtained to flush safety-related heat exchangers in the Component Cooling Water System and that strainers had not been installed at the heat exchangers to prevent the entrance of foreign objects into the heat exchanger's shell side.

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

- B. 10CFR50, Appendix B, Criterion III, Requires that measures be established to assure the applicable regulatory requirements and the design basis are correctly translated into specifications. The accepted QA program, FSAR Section 17.1A.3.2; states that Basic Design Criteria are developed to form the basis for translating requirements into detailed designs. FSAR Section 9.5.1.3 states that the compartment in which the carbon dioxide storage tank is located in the Diesel Generator Building is designed with a blowout wall to the atmosphere.

Contrary to the above, as of April 16, 1981, measures had not been established to assure that applicable regulatory requirements and the

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designed basis were correctly transmitted into specifications in that no procedures were established to insure that FSAR commitments for a diesel generator building blowout wall were incorporated in the design specifications.

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

- C. 10CFR50, 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. QCI-1:2, Section 5.2, states that responsible engineering representatives shall be responsible for initiating Non-Conforming Condition Reports (NCR's).

Contrary to the above, as of April 16, 1981, activities affecting quality had not been accomplished in accordance with instructions in that an NCR had not been written by responsible engineering representatives to identify previously certified expansion anchor lot proof load tests which were non-conservatively tested by as much as twenty five percent.

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

- d. 10CFR50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality, such as defective material and non-conformances, are promptly corrected. The accepted QA program, FSAR Section 17.1A.17, states that procedures are provided for correction of adverse conditions.

Contrary to the above, as of April 16, 1981, measures were not established to assure that conditions adverse to quality were promptly corrected in that Non-Conforming Condition Report, 2611R, which identified defective 3/8" self drilling bolt anchors, was invalidated by Construction Management. Subsequent correspondence between Construction and Engineering Design failed to clearly define corrective action and prompt corrective action was not taken.

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

- E. 10CFR50, Appendix B, Criterion V, requires that activities affecting quality be accomplished in accordance with instructions. The Accepted QA program, FSAR Section 17.1A.5, states the assurance is provided that activities are accomplished in accordance with these instructions. QCI-11, Print Room Procedure, Section 6.1.4.2, requires revised drawings to be distributed to holders or superceded drawings. Craft personnel will acknowledge receipt by signing the attached drawing and shall return the list with the title blocks.

Contrary to the above, as of April 2, 1981, activities affecting quality were not accomplished with instructions in that twenty-four of thirty-seven drawings found in the field had been superceded which indicated that revised drawings had not been properly distributed or the acknowledgement of receipt of superceded drawings had not been accomplished.

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

- F. 10CFR 50, Appendix B, Criterion XVII, requires that records contain closely related data, such as qualifications of equipment. The accepted QA program, FSAR Section 17.1A.17 states that construction procedure Quality Assurance Records contain provisions for records generated at the site during the construction phase. Quality Control Instruction (QCI) 1.8, Quality Assurance Records, Section 5.1.f, states that the engineering limit supervisor prepares site-originated quality assurance records required by the quality assurance program.

Contrary to the above, as of April 16, 1981, records did not contain closely related data for equipment qualification in that attachment A of QCP-1.14, Production Lot Acceptance Test on Expansion Type Bolt Anchors, did not contain justification data for hydraulic "jacks" used in bolt anchor testing.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty 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. Consideration may be given to extending your response time for good cause shown. 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: JUL 0 8 1981