

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 October 21 - November 23, 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 III, requires that measures be established for the selection and review for suitability of application of materials that are essential to the function of systems and components. The approved QA program, FSAR section 17.1A.3.4, states that material selections are made from codes, standards and design criteria and that the selections are reviewed for suitability of application by the Thermal Power Engineering Branches.

Contrary to the above, as of November 23, 1981, established measures for the selection and review for suitability of application of materials, that are essential to the function of systems and components did not include provisions ensuring environmental suitability of materials used in containment. Epoxy resin grout, selected for use with safety-related hanger installations in containment, was not reviewed for environmental suitability.

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

- B. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be accomplished in accordance with procedures. The accepted QA program, FSAR 17.1A, commits to Safety Guide 28 which endorses ANSI N45.2-1971. Section VI of the standard specifies the same requirements as Appendix B. Section 1.0 of Civil Design Standard DS-C1.3.2, "General Design Information, Live Loads," requires that loads estimated during design be rechecked as soon as final manufacturers weights are available to avoid possible overstress conditions.

Contrary to the above, as of November 23, 1981, activities affecting quality were not accomplished in accordance with procedures, in that live loads estimated for 3/4" and 1/2" Y-type globe valves shown on TVA drawing 47 B001-2 were not rechecked and were exceeded by the manufacturer's final weights.

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

- C. 10 CFR 50, Appendix B, Criterion XI, requires that a test program be established to assure that all testing required to demonstrate that components will perform satisfactorily in service is identified and

performed with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The approved QA program, FSAR section 17.1A.11.3, states that the adequacy of field erection and installation is verified by a construction test program. Vendor drawing (Amercian Warming and Ventilating 11577), approved by Engineering Design, specified that the containment air return fan backdraft dampers be capable of withstanding fifteen pounds per square inch differential in the closed direction.

Contrary to the above, as of November 23, 1981, the established test program had not identified testing required to demonstrate the integrity of the containment air return fan backdraft dampers under back pressure, which is a safety-related function.

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

- D. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented drawings of a type appropriate to the circumstances. The approved QA program, FSAR section 17.1A.5, commits to Safety Guide 28 which endorses ANSI Standard N45.2. Section VI of the standard contains the same requirements as does Criterion V.

Contrary to the above, as of November 23, 1981, activities affecting quality were not prescribed by drawings of a type appropriate to the circumstances in that the mechanical ductwork drawing notes (47W915 series) specified the use of Construction Specification G-39 for cleanliness control; however, G-39 did not contain cleanliness requirements for HVAC ductwork systems.

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 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: DEC 23 1981