## ENCLOSURE 1

## NOTICE OF VIOLATION

Tennessee Valley Authority Watts Bar 1 and 2

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on October 18 through November 20, 1989, one violation of NRC requirements was identified with two examples. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violation examples are listed below:

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings", is implemented in part by the Nuclear Quality Assurance Manual (NQAM), Part 1, Section 2.5, Revision 2, which states that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. The Quality Assurance Topical Report, TVA-TR75-1, Revision 10, further implements 10 CFR Part 50 Appendix B, and commits to ANSI Standard N45.2.3-1973, which requires procedures for ensuring plant cleanliness, and to ANSI N18.7-1976, which requires independent verification of clearance tagging boundaries. Administrative Instruction (AI) 2.19, Revision 5, states in paragraph 6.6.2, "When safety related. equipment is removed from service for protection of personnel, the clearance procedures shall require independent verification for alignment, for tagging, and for return to service from off-normal configuration." Contrary to the above,

- The licensee failed to establish or implement instructions, procedures, or drawings to ensure cable tray cleanliness, in that on November 1, 1989, tools, metal debris, insulation clips, and nails were found in electrical cable trays 5B2081 and 4B2125. This foreign material could possibly have led to damage of safety-related cables.
- 2. As of May 1989, the licensee adopted a policy of not performing the independent verifications of equipment clearances which were required by AI 2.19. Examples of clearances on safety-related equipment which were not independently verified included hold orders 890606, 890607, 890608, and 890609 on the Safety Injection System, and 890697 on the Auxiliary Feedwater System.

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

Pursuant to 10 CFR 2.201, you are hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Associate Director for Special Projects, Office of Nuclear Reactor Regulation, and a copy to the NRC Resident Inspector, Watts Bar, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly

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marked as a "Reply to a Notice of Violation" and should include: (1) admission or denial of the violation; (2) the reason for the violation 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. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

Bruce A. Wilson, Assistant Director for Inspection Programs

TVA Projects Division

Office of Nuclear Reactor Regulation

dated at Atlanta, Georgia this 3rd day of January 1990