

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

Docket Nos. 50-390
License Nos. CPPR-91

During the Nuclear Regulatory Commission (NRC) inspection conducted from March 17 through April 20, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

Part 50 of Title 10 of the Code of Federal Regulations, 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 N18.7-1976, which, in part, prescribes design change and configuration control requirements. Volume 4, Section V, paragraph 2.8.3, of the Watts Bar Nuclear Performance Plan requires that design changes be accomplished using the package concept and requires that plant modifications be complete and accepted by Quality Control prior to modifying the affected drawings and documents. ASME Section III, articles NB-6113 and ND-6110, are the applicable code requirements for hydrostatic testing and require fabricated piping to be hydrostatically tested prior to operation.

Contrary to the above, Administrative Instruction 8.8, "Design Change," was not appropriate in that it allowed plant drawings and procedures to be updated prior to completion of hardware modifications in the plant. As a result, on February 23, 1990, configuration controlled control room drawings showed an incomplete Essential Raw Cooling System anti-cavitation modification to the "C" Component Cooling Water heat exchanger as being complete, and yet the system was in operation without having been hydrostatically tested, with questionable structural supports, and with the electrical portion of the modification incomplete. In addition, relief valve 1-67-1025D was pressurized and in use prior to any hydrostatic testing having been performed on the modified piping installation.

This is a Severity Level IV Violation (Supplement II) and applies to Unit 1.

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Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is 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 Regional Administrator, Region II, 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 marked as a "Reply to a Notice of Violation" and should include [for each violation]: (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) the 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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION

Linda J. Watson for
Bruce Wilson, Chief
TVA Projects

Dated at Atlanta, Georgia
this 22nd day of June 1990