## ENCLOSURE 1

## NOTICE OF VIOLATION

Tennessee Valley Authority Watts Bar Unit 1 Docket No. 50-390 License No. CPPR-90

During the Nuclear Regulatory Commission (NRC) inspection conducted from July 23 through July 27, 1990, one 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," requires, in part, that activities affecting quality, "....shall be accomplished in accordance with instructions, procedures, and drawings," and that these instructions, procedures, and drawings, "....shall include appropriate quantitative and qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

 Procedure AI-1.8, "Plant Housekeeping", Revision 26, Section 6.5, Step 6.5.8 requires that the licensee implement Technical Instruction (TI)-27, "Cleaning and Cleanliness of Fluid systems and Components," Revision 28. Section 5.0, Parts A, B, and C require that cleanliness controls be established to prevent the degradation of systems and components when work activities may adversely affect system cleanliness.

Contrary to the above, during work activities (Workplan KPO 4335A-1) associated with the sandblasting and repainting of the Unit 1 Condensate Storage Tank, the licensee failed to cover the suction pipes to the Auxiliary Feedwater System. Failure to adequately isolate this suction pipe allowed sandblast material to become entrained in this section of the line, thereby creating a potential condition adverse to system operability and system design.

2. Procedure AI-2.8.15, "Corrective Action - WBN," Revision O, specifies requirements for closing CAQs in Section 3.3, "Administering Corrective Action," Section 3.5, "Closing CAQs," and Section 3.7, "Processing Problem Reporting Documents." Section 3.5 states "Close non-CAQs, or CAQs or CAQs that are the same CAQ documented on an existing CAQR, PRD, or ACP with a written detailed justification (including the identification number of the existing CAQ document.)"

Contrary to the above, the licensee superseded (cancelled) potential CAQ (WBP900303) which required specific corrective actions to fix an identified adverse condition, prior to incorporating those corrective actions into an Administrative Control Procedure (Workplan). The licensee determined that the foreign material in the Auxiliary Feedwater System (sandblast material), would necessitate the removal

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and flushing of portions of the system to correct this condition. To accomplish this the licensee determined that this activity could be conducted under control of their Workplan Administrative Control Procedure, as allowed in AI-2.8.15, Section 3.5. However, the licensee failed to incorporate the corrective actions in the workplan before superseding the CAQ.

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

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

Bruce A. Wilson, Chief TVA Projects

Dated at Atlanta, Georgia this *IS* day of October 1990