

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

Docket No. 50-390
Construction Permit No. CPPR-91

During an NRC inspection conducted on August 20 through September 16, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, and TVA's Nuclear Quality Assurance Plan require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions and drawings shall include appropriate quantitative or qualitative acceptance criteria to determine that activities have been satisfactorily accomplished.

Contrary to the above, Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Site Standard Practice SSP-7.53, and Modification and Addition Instruction MAI-3.1 were not complied with in the following cases:

1. Modification and Addition Instruction MAI-3.1, Installation of Electrical Conduit Systems and Conduit Boxes, Revision 12, Section 6.2.22.b, specifies the 45W3000 series electrical drawings for providing separation criteria between conduit to tray, tray to tray, and cables in free air. Drawing 45W3000-1, Revision 1, Section 4, requires a minimum separation of one inch when a conduit of one division crosses a cable tray containing cables of a redundant division.

As of August 30, 1995, Division B flexible conduit MC662B was separated less than one-inch distance from Division A open cable tray at tray node 3A2454.

2. Modification and Addition Instruction MAI-3.1, Installation of Electrical Conduit Systems and Conduit Boxes, Revision 12, Section 6.2.22.b, specifies the 45W3000 series electrical drawings for providing separation criteria between conduit to tray, tray to tray, and cables in free air. Drawing 45W3000-1, Revision 1, Section 3, requires a minimum separation of greater than one inch between free air cables of one division and a conduit of the opposite division.

Enclosure 1

As of August 30, 1995, Division A free air cables from Division A cable tray at node 4A2651 and conduit 1PLC3903A were separated less than one-inch distance from Division B conduit 1PLC3398B.

3. Modification and Addition Instruction MAI-3.1, Installation of Electrical Conduit Systems and Conduit Boxes, Revision 12, Section 6.2.22.b, specifies the 45W3000 series electrical drawings for providing separation criteria between conduit to tray, tray to tray, and cables in free air. Drawing 45W3000-1, Revision 1, Section 2, requires a minimum vertical separation distance of 12 inches (tray top of lower tray to tray bottom of upper tray). Acceptance criteria is not provided for configurations where the cables in the lower tray extend over the height of the tray side rails. Division A cable tray at node 3A112 crosses over Division B cable tray at node 3B264.

As of August 28, 1995, the cables installed at tray node 3B264 extend above the height of the tray side rails. The vertical distance between the Class 1E Division B cables and the bottom of the Division A tray was less than 12 inches.

4. Modification and Addition Instruction MAI-3.1, Installation of Electrical Conduit Systems and Conduit Boxes, Revision 12, Section 6.2.22.b, specifies the 45W3000 series electrical drawings for providing separation criteria between conduit to tray, tray to tray, and cables in free air. Drawing 45W3000-1, Revision 1, Section 2, requires the installation of tray covers whenever vertical separation distances between tray crossings cannot be maintained. The covers are required to be installed for a minimum distance of three feet on each side of the tray crossing. Division A cable tray at node 3A111 crosses over Division B cable tray at node 3B266.

As of August 28, 1995, due to insufficient physical separation between the redundant division cable trays, a tray cover at node 3B266 was required to be installed for a distance of three feet on each side of the tray crossing. However, on one side of the tray crossing the installed tray cover length only extended 18 inches.

5. Site Standard Practice SSP-7.53, Modification Workplans, Revision 13, Section 2.8.A.3.a, requires, when field work scope is transferred from one work implementing document to another, to verify that the receiving work implementing document has been initiated and includes the transferred work scope. Additionally, Section 2.9.F requires a confirmation that any work scope transferred out of a workplan was adequately justified or was captured in accordance with Section 2.8.A. Division B cable tray between nodes 4B2438 and 4B2446 (wall) was physically marked indicating the need for a tray cover. In February 1995, Workplan D-10471-110 was implemented to install a tray cover between the respective cable tray nodes. In July 1995, Workplan D-35918-09 removed the cable tray cover to facilitate cable installations in

the cable tray. The workplan was annotated to document that the cable tray cover would be reinstalled through the implementation of Workplan D-10471-110. As of August 28, 1995, workplan D-35918-09 had been closed without confirming that the transferred work scope was included in Workplan D-10471-110. Workplan D-10471-110 did not contain a requirement to reinstall the tray cover, and the cover was not installed.

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 U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 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 of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the construction permit should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 11th day of October 1995