

NOTICE OF VIOLATION

Tennessee Valley Authority  
Watts Bar Unit 1

Docket No. 50-390  
License No. NPF-90

During an NRC inspection conducted May 19 through June 29, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (NUREG 1600), the violations are listed below:

- A. Technical Specification 5.7.1.1 requires that written procedures be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. This includes procedures required for the safe control of maintenance for nuclear power plants.

Site Standard Practice (SSP)-6.02, Maintenance Management System, Revision 16, Section 2.5.1.C.5, requires a worker to "document irregularities or differences pertaining to the equipment in the work performed section." SSP-6.02, Appendix G, Actual Work Performed Form, states a worker shall provide "a summary of as found condition" in the As Found Condition section and shall provide sufficient detail that would allow "the identification of problems/deficiencies found during work performance, the actions taken to correct" in the Actual Work Performed section of the form.

SSP-6.02, Maintenance Management System, Revision 16, Section 2.4.3, requires, in part, that a foreman initiate an appropriate corrective action program document if a deficiency met criteria in Appendix EE, Deficiency Evaluation Guidance. Appendix EE requires initiation of a Problem Evaluation Report if a deficiency on safety-related equipment needs an extent of condition evaluation or constitutes an installation error or human error.

Contrary to the above, as of June 10, 1996, the licensee failed to follow maintenance procedures for completed Work Order 96-0691-00 on the safety-related 1B-B centrifugal charging pump in the following examples:

1. Workers and reviewing foremen did not document irregularities or differences regarding excessive difficulty in removing an oil strainer which was painted over on the 1B-B charging pump in the work performed section in that a summary of as-found condition was not included in the As Found Condition section. This section was left blank.
2. Workers and reviewing foremen did not document irregularities or differences with a painted over oil strainer on the 1B-B charging

Enclosure 1

pump in the Actual Work Performed section in that sufficient detail that would allow the identification of problems found during work performance and the actions taken to correct them were not included in the Actual Work Performed section. The Actual Work Performed section listed completed work steps and did not mention the painted over strainer problem or the reason for replanning of the work order to remove the entire strainer assembly.

3. Neither the workers nor the foremen initiated an appropriate corrective action program document to correct the painted strainer deficiency which constituted a deficiency on safety-related equipment that needed an extent of condition evaluation and constituted an installation error or human error. The painted strainer resulted in replanning of the work order and approximately five extra hours of out-of-service time in a Limiting Condition for Operation.

This is a Severity Level IV violation (Supplement I).

- B. Technical Specification 5.7.1 requires, in part, that written procedures be established, implemented, and maintained covering the procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978, and the Offsite Dose Calculation Manual program detailed in Technical Specification 5.7.2.

Regulatory Guide 1.33 requires procedures for control of effluent radioactivity including liquid radioactive waste system sampling, monitoring, and discharging to limit materials released to environment and personnel exposure.

System Operating Instruction (SOI)-77.01, Liquid Waste Disposal, Revision 13, provides, in part, steps for release of liquid radioactive waste from a cask decontamination collector tank to the cooling tower blowdown.

Offsite Dose Instruction (ODI)-90-1, Liquid Radwaste Tank Release, Revision 6, provides, in part, steps for sampling, analyses, calculations, source checks, and setpoint changes required by the Offsite Dose Calculation Manual to perform liquid radioactive effluent releases via the cooling tower blowdown.

Contrary to the above, for a June 10, 1996, cask decontamination collector tank release, licensee procedures were inadequate, in that, instruction ODI-90-1 did not require liquid effluent monitor 0-90-RE-122 background count rates to be validated prior to the release resulting in the establishment of nonconservative monitor setpoints, and procedure SOI-77.01 did not require the sample flow rates to be verified resulting in a monitor sample flow rate which exceeded the ten gallon per minute limit specified in the vendor technical manual.

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3

This is a Severity Level IV violation (Supplement IV).

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 license 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 25th day of July 1996