

MAR 19 1993

*Official copy*

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

Tennessee Valley Authority  
ATTN: Dr. Mark O. Medford, Vice President  
Nuclear Assurance, Licensing & Fuels  
3B Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Gentlemen:

SUBJECT: NOTICE OF VIOLATION  
(NRC INSPECTION REPORT NOS. 50-390/93-10 AND 50-391/93-10)

This refers to the NRC inspection conducted by G. A. Walton on January 22 through February 19, 1993. The inspection included a review of activities authorized for your Watts Bar facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

The enclosed inspection report documents the NRC conclusions regarding the TVA implementation of the Use-As-Is CAQ Special Program. Based on this inspection and others referenced in this report, NRC concurs with TVA's July 24, 1992, letter that the Use-As-Is Special Program is acceptably implemented. This program is closed.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violations described in the enclosed Notice involved: 1) failure to follow procedures and obtain procedure approval prior to performing safety related work on snubber testing; 2) failure to calibrate a pressure test gage prior to pressurizing an electrical containment penetration; and 3) failure to provide documentation for welding on a reactor shield building penetration seal weld. In light of the history of records problems, we are especially concerned that these issues, all related to new work, would have produced records that did not meet the requirements of 10CFR50, Appendix B.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future

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inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements. Related to Violation B in the enclosed Notice, we are concerned with the control problems with documentation of procedural records exhibited during the removal of Pacific Scientific mechanical snubbers. As such, you are requested to provide us the reasons for this record generation problem and your corrective action to prevent recurrence.

Additionally, the NRC has a concern with the apparent lack of involvement by your Quality Assurance organization. During this inspection period, the NRC identified problems in the upper head injection removal closure process, the procedure approval and work activities associated with the snubber inspection program, and the pressure test performed on an electrical containment penetration. In each of these areas we noted that Quality Assurance/Quality Control had not performed oversight prior to the NRC inspection. Many of the problems noted by the NRC were an apparent lack of properly documenting test results, closing out open documents or not adequately controlling working level procedures. Your Quality Assurance organization should be identifying these type of problems so that they can be promptly corrected.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and any reply will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. 96.511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

(Original signed by E. Merschoff)

Ellis W. Merschoff, Director  
Division of Reactor Projects

Enclosures:

1. Notice of Violation
2. NRC Inspection Report

cc w/encls: (See page 3)

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cc w/encls:

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The Honorable Garland Lankford  
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A. Harris

bcc w/encls: (See page 4)

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