

NOTICE OF DEVIATION

Tennessee Valley Authority  
Watts Bar

Docket No.: 50-390  
License No.: CPPR-91

During an NRC inspection conducted on February 8-19, 1993, a deviation of written commitments was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the deviation is listed below:

Licensee FSAR Section 14.2.1 third paragraph documents the commitment that preoperational tests will be performed on components, systems and structures that perform safety related functions and selected non-safety related functions.

TVA letter dated January 13, 1993 is the response to NRC request for additional information (RAI) concerning FSAR Chapter 14.0 Initial Test Program. This letter further documents TVA commitments concerning the performance of preoperational tests as follows:

Page 11, TVA's response to NRC question 7.b states that:

Compliance with RG1.68, Revision 2 (with exceptions) does not reduce Watts Bar Nuclear commitment to perform preoperational tests of all safety related components, systems, and structures and appropriate tests of non-safety related systems.

Page 20, TVA's response to NRC question 7.d specifies:

1. "Replace the third paragraph of section 14.2.1 in its entirety with the following new paragraph." The new paragraph states in part that:  
During the preoperational testing phase, two types of tests will be performed to satisfy FSAR test requirements; (1) component tests and (2) preoperational tests. Component tests will be performed on safety related and non-safety related components to verify proper installation and cleanliness and to demonstrate performance of individual components to be in accordance with design requirements. Preoperational tests will be performed on safety related and selected non-safety related structures, systems and components as required to demonstrate performance of completed systems and structures to be in accordance with design requirements.

Contrary to the above, on January 14, 1993 a Startup and Test Group memorandum to the Startup Manager and a Joint Test Group meeting No. 1-93-12 reviewed and approved (February 15, 1993) the deletion of scheduled preoperational tests for safety related systems: 213 Reactor

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MOV Power; 214 Control and Auxiliary Vent Board Power; 215 Diesel Auxiliary Power and 232 Reactor Vent Power. The licensee concluded in these documents that component tests using generic test procedures was sufficient to check the functions of each of the above 1E Motor Control Centers, their indications, annunciators and design features. Generic test procedures are construction tests and are prerequisites to a preoperational tests.

Please provide to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and if applicable, a copy to the NRC Resident Inspector, in writing within 30 days of the date of this Notice, the reasons for the deviation, the corrective steps which will be taken to avoid further deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia  
this 17th day of March 1993