

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar 1

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

During an NRC inspection conducted on March 29 - April 2, 1993, and April 12-16, 1993, a 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, the violation is listed below:

10 CFR 50, Appendix B, Criterion V, and the licensee's accepted Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Revision 3, Section 6.2.2.B, require, in part, that quality related activities shall be performed in accordance with approved and controlled instructions, procedures, and drawings. The following examples describe instances where licensee personnel failed to follow approved procedures:

- (1) Paragraph 2.2.2.C of procedure SSP-6.02, Maintenance Management System, Revision 9, specifies that planners for safety-related work orders are to use information from approved vendor manuals, and, if needed information is not in the manual, use NE approved vendor drawings or other approved design documents. Paragraph 2.3.E of SSP-2.10, Vendor Manual/Information Control, Revision 3, specifies that if vendor documentation is needed to support safety-related activities before it can be issued in a vendor technical manual, it shall be processed as a Class 3 manual (conditional use).

Contrary to the above, procedures were not followed when work request C154491 was written on January 27, 1993, and work order 93-01709-00 was approved on February 5, 1993, authorizing work to be performed in accordance with Westinghouse Technical Bulletin (WTB) 92-09 prior to NE approval and incorporation of the WTB into the applicable approved vendor manual and without conditional use controls.

- (2) Paragraph 2.3.3 of procedure SSP-10.05, Technical Evaluation for Procurement of Materials and Services, Revision 8, requires the Procurement Engineering Group (PEG) to perform and document an equivalency evaluation to ensure that spare and replacement items are purchased to the requirements equivalent to those specified for the original equipment. SSP-10.05 further requires that if differences are identified, an engineering evaluation is to be performed to determine the effects of the differences and ensure no design documents are impacted.

Violations

- (1) Failure to follow procedures when a work order was initiated to perform work in accordance with a vendor technical bulletin prior to Site Engineering's approval of the technical bulletin and incorporation of the bulletin into the appropriate approved VTM (paragraph 5)
- (2) Failure to follow procedures when performing a technical evaluation for procurement of a replacement part that was not a "like for like" replacement (paragraph 7.b.)
- (3) The failure of Document Control's assessment program to audit controlled VTMs periodically is not being cited in this report. It is an additional example of a similar failure to follow procedure issue that is being evaluated for enforcement and will be documented in NRC Inspection Report 50-390,391/93-29 (paragraph 6)

Unresolved Items

Required training for modifications and maintenance work planning groups on the use of VTMs and vendor information is identified as an additional example of unresolved item 50-390/93-20-01 (paragraph 8)

Inspector Followup Items

- (1) Licensee review of Vendor Information CAP scope to address the reactor protection system equipment, safety related relays, and the Installation Design Review (IDR) matrix relative to components purchased under the nuclear steam supply system (NSSS) contract (paragraph 3)
- (2) Administrative controls applicable to the use of desk top instructions by engineering personnel during VTM development (paragraph 4)
- (3) Resolution of field walkdown verification discrepancies (paragraph 10)
- (4) Review of conditional use manuals (paragraph 6)

In addition to the above findings, the inspectors expressed concern over the availability of uncontrolled vendor drawings and VTMs in the work area and the potential for misuse of these uncontrolled documents. Uncontrolled VTMs and vendor drawings remain in the work area even though controlled copies are available. The inspectors also expressed concern over the lack of adequate documentation which supported the licensee's conclusions for the Vendor Information CAP completion status.

Strengths

The VTMs reviewed were extensive in detail, of good quality, and accurately cross-referenced in the data base to the installed hardware.

MAY 14 1993

bcc w/encls:

- E. W. Merschhoff, DRP/RII
- J. R. Johnson, DRP/RII
- P. E. Fredrickson, DRP/RII
- B. M. Bordenick, OGC
- M. S. Callahan, GPA/CA
- P. A. Taylor, DRS/RII
- G. C. Lainas, NRR
- F. J. Hebdon, NRR
- L. C. Plisco, OEDO
- P. S. Tam, NRR
- V. Nerses, NRR
- B. S. Mallett, DRSS/RII
- A. F. Gibson, DRS/RII
- NRC Document Control Desk

NRC Resident Inspector
 U.S. Nuclear Regulatory Commission
 Route 2, Box 700
 Spring City, TN 37381

FILE NAME: S:\DRS\EB\WBN9327L.MT

RII:DRS
MS for
 MThomas
 05/5/93

RII:NRR
MS for
 TFoley
 05/5/93

RII:DRP
MS for
 Kivey
 05/6/93

RII:DRS
MS
 MBranch
 05/6/93

RII:DRP
MS
 PFredrickson
 05/10/93

RII:DRS
MS
 CJuTan
 05/14/93
*changes made to
 cover letter
 5/14/93*

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *M. Alexander, Vendor Manual Program Manager, Nuclear Engineering (NE)
- *S. Anthony, Licensing Engineer
- *M. Brickey, Lead Electrical Engineer, NE
- *J. Christensen, Site Quality Manager
- *W. Elliott, Engineering Manager, NE
 - R. Green, Electrical Procurement Supervisor, NE
 - P. Grooms, Quality Services Supervisor, Modifications
- *D. Koehl, Technical Support Manager
- *W. Lewellyn, Compliance Engineer, Site Licensing
- *R. Lewis, Project Manager-Records, Completion Assurance
- *L. Maillet, Site Support Manager
- *G. Mauldin, Manager, Design Control and Special Projects, NE
- *C. McIntosh, Program Manager, Vendor Information Program CAP
- *D. Moody, Plant Manager
- *W. Museler, Site Vice President
 - D. Nelson, Maintenance Manager
- *P. Pace, Compliance Licensing Manager
- *G. Pannell, Site Licensing Manager
- *S. Tanner, Support Services Manager, Modifications

Other licensing employees contacted during this inspection included craftsmen, engineers, and administrative personnel.

NRC Employees

- G. Humphrey, Resident Inspector
- *E. Merschhoff, Director, Division of Reactor Projects, Region II
- *G. Walton, Senior Resident Inspector

*Attended exit meeting

Acronyms and initialisms used throughout this report are listed in the last paragraph.

2. Background

TVA identified a number of problems with their vendor information program at WBN through various CAQ reports, employee concerns, TVA audit findings, and NRC inspection findings. Specific problems identified included: (1) vendor information that was inadequately evaluated for implementation; (2) vendor information that did not match the plant configuration; (3) vendor information that was inconsistent with related TVA developed design input/output documents; (4) incorrect or out-of-date vendor documents; (5) inadequate vendor document control program; (6) lost or uncontrolled vendor manuals; and (7) installations that were not approved by TVA NE.