## **ENCLOSURE 1**

## NOTICE OF VIOLATION

Tennessee Valley Authority Watts Bar

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

During an NRC inspection conducted on July 6-10; 19-24; 28-31; August 11-14; and September 10-12, 1992, 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 requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Additionally, the licensee's accepted Nuclear Quality Assurance Plan TVA-NQA-PLN89, Revision 2, Section 7.2.7.F requires that measures to control plant configuration and ensure that the actual plant configuration is accurately depicted on drawings shall be established, documented, and implemented.

On July 7, 1992 Preoperational Test instruction PTI 211-01, 6.9 KV Shutdown Boards, Revision 0, was approved by the Engineering/Modification Manager and issued for use. Section 2.2 of PTI 211-01, Development References, list some, but not all the applicable design drawings that corroborate test requirements and test acceptance criteria.

Engineering Administrative Instruction EAI 3.09, Incorporation of Change Documents into Drawings, Revision 5, Section 4.1.1.E establishes requirements for incorporating change documents into drawings in accordance with time limits shown in Appendix C. Primary drawings are required to be updated within 15 days of the work completion date.

Engineering Administrative Instruction EAI 3.07, System Plant Acceptance Evaluation, Revision 1, Section 6.3, Start of Preop Testing, establishes requirements for system 211 that as modification work is completed primary and critical drawings are updated to reflect as constructed configuration.

Contrary to the above, during this inspection, NRC identified that the following System 211 drawings were not updated to accurately reflect as - constructed plant configuration based on various identified drawing deficiencies.

- Drawing No. 1-45W760-211-1, Wiring Diagram, 6900 Volt Shutdown Power Schematic Diagram, Revision three.
- Drawing No. 1-45W760-211-19, Wiring Diagram, 6900 Volt Shutdown Power Schematic Diagram Revision one.

 Drawing No. 1-45W760-211-9, Wiring Diagram, 6900 Volt Shutdown Power Schematic Diagram, Revision five.

Contributing to this failure to maintain configuration control of the drawings that are necessary and sufficient to support performance of PTI 211-01 was the Licensee's failure to initiate Design Change documents for the following system 55 drawings to incorporate test requirements and test acceptance criteria.

- Drawing No. 47B601-55-66, Electrical Instrument Tabulation, Revision M
- Drawing No. 47B601-55-67, Electrical Instrument Tabulation, Revision C
- Drawing No. 47B601-55-68, Electrical Instrument Tabulation, Revision C
- Drawing No. 47B601-55-69, Electrical Instrument Tabulation, Revision C
- Drawing No. 1-45W600-55-36, Annunciator System Key Diagram, Revision one
- Drawing No. 1-45W600-55-37, Annunciator System Key Diagram, Revision one
- Drawing No. 1-45W600-55-38, Annunciator System Key Diagram, Revision one
- Drawing No. 1-45W600-55-39, Annunciator System Key Diagram, Revision one

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 at the facility that is the subject of this Notice, 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: (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

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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.

Dated at Atlanta, Georgia this 18thday of October 1992