

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

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

During an NRC inspection conducted on July 9 through August 5, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, and TVA Nuclear Quality Assurance Plan TVA-NQA-PLN89A, Revision 4, Section 6.1, require that activities affecting quality be prescribed by documented instructions or procedures and be accomplished in accordance with these instructions or procedures.

Contrary to the above, activities affecting quality were not accomplished in accordance with documented instructions or procedures in the following examples:

1. Plant Administrative Instruction PAI-2.08, Annunciator Disabling/Enabling, Revision 1, delineated the following procedural requirements:
 - Step 2.2.L.4) required the following action associated with a disabled annunciator: Place an Orange Sticker on affected alarm window to indicate an input to that alarm has been disabled.
 - Attachment 1, Disabled Alarm Checklist, Step 5, required the performer's signature and a second party verification signature indicating completion of the following actions: This alarm has been disabled as described in Section 1 of this form and Orange Stickers have been placed on affected alarm windows.
 - Step 2.2.L.3) required the unit operator and the shift operations supervisor/assistant shift operations supervisor to perform the following documentation actions: Log alarm disablement on Index Sheet Attachment 2 and in unit operator and shift operations supervisor/assistant shift operations supervisor daily journals when alarm is disabled. The entry should include alarm location, method used to disable alarm, date and time removed, justification for disablement, and Tech Spec action requirements if applicable.

Enclosure 1

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- Use of Revision 1 of Plant Administrative Instruction PAI-2.08 effective May 11, 1995.

Contrary to the above, as of July 27, five of seven disabled main control room annunciators did not have orange stickers attached to the annunciator windows; disabled main control room annunciators 85F, 89C, and 135F were not logged in the unit operator's daily journal; and, five different Attachment 1 forms from Plant Administrative Instruction PAI-2.08 were initiated after the effective date of Revision 1 (May 11, 1995) using Revision 0 forms.

2. Site Standard Practice SSP-12.56, Tracking of Technical Specification Equipment Out of Service, Revision 3, required the following:

- Section 1.2 required all Technical Specifications-related equipment that is taken out of service to be tracked by completion of a Limiting Condition for Operation (LCO) Tracking Sheet in the LCO Tracking Log. This is required even if the plant is in a mode that does not require the equipment to be operable.
- Section 2.2.F.2 required the shift operations supervisor to review all applicable requirements and sections of the LCO Tracking Sheet to ensure all applicable alignment checklists have been completed and that the equipment is ready for service before exiting the LCO and signing for returning the equipment to service.
- Site Standard Practice SSP-12.56, Maintenance Management System, Revision 15, Section 2.6.3, required work documents to be electronically tracked in the Maintenance Tracking system to record the status, condition, and location of a work document by using applicable status codes. Appendix U of Site Standard Practice SSP-6.02 defined the maintenance tracking system code "CR" as the status that applies to a work order that is field complete and is with the craft foreman for review.

Contrary to the above, procedures were not followed as described below:

- On July 26 at 5:00 a.m., normally locked open Auxiliary Feedwater Valves 1-ISV-3-827, 828, and 829 were found closed and were not tracked by an LCO Tracking Sheet in the LCO Tracking Log. Closing of the valves rendered the two motor-driven trains of the auxiliary feedwater inoperable in accordance with the requirements of Technical Specification 3.7.5, Auxiliary Feedwater System.

- On July 25 at 1:00 p.m., the LCO Tracking Sheet for LCO Log Entry 95-207 was signed and removed from the LCO Tracking Log without verification that auxiliary feedwater isolation valves 1-ISV-3-827, 828, and 829 were restored from closed to locked open. The LCO Tracking Sheet for LCO Log Entry 95-207 annotated that the LCO log entry was due to closing the auxiliary feedwater isolation valves.
 - A "CR" code was assigned to Work Orders 95-11064-02, 03, 04, 06, 07, and 08 prior to field completion of restoration work to lock open Valves 1-ISV-3-827, 828, and 829.
3. General Operating Instruction GO-1, Unit Startup from Cold Shutdown to Hot Standby, Revision 1, Step 5.6(7)(e), required steam generator narrow range levels to be maintained between 32 and 60 percent.

Contrary to the above, a shift operations supervisor verbally authorized reactor operators to allow steam generator levels to reach 70 percent without processing a procedure change.

This is a Severity Level IV violation and applies to Unit 1 (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, 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 31st day of August 1995