

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

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

During an NRC inspection conducted September 19 through October 16, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, 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.

Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 3, Section 6.1, requires that quality-related activities shall be prescribed by documented procedures and instructions appropriate to the circumstances. Activities shall be accomplished in accordance with these procedures and instructions.

Contrary to the above, activities affecting quality were not accomplished in accordance with approved procedures:

1. Site Standard Practice SSP-7.50, Controlling WBS Processes, Revision 8, Section 6.2, paragraph 6.2.1.G, requires nuclear quality assurance inspectors to verify fit-up attributes in accordance with work implementing documents and the nondestructive examination procedures manual.

On September 10, 1993, and September 13, 1993, procedure SSP-7.50 was not adhered to in that quality control inspectors failed to properly inspect and identify that the six electrical conduit supports listed below were not fabricated in accordance with work implementing documents:

D0885918-4-F26991A	D0885918-7-F26991A
D0885918-5-F26991A	D0885918-8-F26991A
D0885918-6-F26991A	D0885918-9-F26991A

2. Site Standard Practice SSP-3.06, Problem Evaluation Reports, Revision 11, paragraph 2.0, states it is the responsibility of all individuals to promptly identify and report all problems to the appropriate organization for evaluation and disposition. Further, paragraph 2.1 indicates that conditions that are not minor (having

an impact on quality of work) require initiation of a problem evaluation report, within one working shift.

On September 20, 1993, procedure SSP-3.06 was not adhered to in that a problem evaluation report was not initiated within one working shift for the six nonconforming electrical conduit supports listed above.

3. Quality Assurance Instruction QAI-10.01, Quality Control Inspection Records, Revision 5, paragraph 2.1.2, states that the quality control inspector is responsible for documenting all inspection results on an inspection report and data sheets. Further, the quality control inspector is responsible for documenting a brief description of unsatisfactory conditions on the plant instruction data sheet.

Quality Management Procedure QMP-110.1, Inspection Planning and Reporting, Revision 7, paragraph 6.3.6, states that an inspection report may be voided by writing VOID at the top of the form and describing the reason in the remarks column. The inspection report shall be approved by the quality control supervisor.

On September 20, 1993, procedure QAI-10.01 and QMP-110.1 were not adhered to in that for the six electrical conduit supports listed above the unsatisfactory condition was not documented by a quality control inspector and a description of the unsatisfactory condition was not documented on the plant instruction data sheet; and the inspection report was improperly voided and was not approved by the quality control supervisor.

This is a Severity Level IV violation (Supplement II).

- B. 10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, 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.

Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 3, Section 6.1, requires that quality-related activities shall be prescribed by documented procedures and instructions appropriate to the circumstances. Activities shall be accomplished in accordance with these procedures and instructions.

Contrary to the above, activities affecting quality were not accomplished in accordance with approved procedures:

1. Site Standard Practices SSP-7.53, Modification Workplans, Revision 9, Appendix A, indicates that the responsible engineer shall replace data sheets when procedure revisions have an impact on the data applicable to the task.

As of October 15, 1993, SSP-7.53 was not adhered to in that installation data sheets for regular embedment undercut anchors contained in workplan D-05611-02 for support 1026-A206-10-4 were not properly updated with the correct torque and concrete free edge distance when a procedure revision had an impact on the data in that the data sheets specified a torque value of 300 foot pounds and a concrete free edge distance of 11 inches.

2. NEP-3.1, Calculations, Section 3.7, requires that when the basis for judgments for the support of a design cannot be adequately defined by a technical justification statement, then formal analysis, including preparation of a supporting calculation, is appropriate.

As of October 15, 1993, NEP-3.1 was not adhered to in that a detailed evaluation/analysis was not provided to support the adequacy of all previously installed regular length undercut concrete expansion anchors installed with minimum edge distances below the specified requirements of the current G-66 specification.

3. Modification Addition Instruction MAI-5.1C, Undercut Concrete Anchors, Revision 7, paragraph 6.2.13.6.B, requires that shallow embedment undercut anchor bolts be snug tightened.

As of August 25, 1992, MAI-5.1C was not adhered to in that shallow embedment undercut concrete anchors for support 1067-A206-12-26, required to be installed in WP D-06129-03, were torqued to 300 foot pounds instead of being snug tightened.

4. Site Standard Practices SSP-3.01, Quality Assurance Program, Revision 7, paragraph 2.5E, states that inspections shall be performed in accordance with the approved work instruction or referenced procedures.

On August 25, 1992, SSP-3.01 was not adhered to in that quality control inspections were not performed in accordance with the referenced procedures in workplan D-06129-03 for support 1067-A206-12-26. This resulted in failure to detect improperly torqued shallow embedment undercut anchor bolts.

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, 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

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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.

Dated at Atlanta, Georgia
this 12th day of November 1993