

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

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

During an NRC inspection conducted March 5 through April 15, 1995, 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, as implemented by Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 4, Section 6.1, requires that quality-related activities shall be accomplished in accordance with documented procedures and instructions appropriate to the circumstances.

Site Standard Practice SSP-9.54, Return to Service and Closure of Modifications, Revision 8, Section 2.4, Initiation of a Modification Turnover Package, Step Q under Operations states: "Review Impact Review Form items against the final as-built condition and final design requirements. (Review relevant F-DCNs, 10 CFR 50.59 Review revisions, and so forth.)"

Engineering Administrative Instruction EAI-3.05, Design Change Notices, Revision 21, Section 5.5, Advanced Authorizations, Step 5.1.1, Limitations, states in part, ". . . advance authorizations of F-DCNs shall not be used to change system logic, function, performance, or operation."

Engineering Administrative Instruction EAI-3.05, Section 5.1, DCN Initiation and Approval, Step 5.1.6.a, under the criteria for a Work Design Change Notice, states in part, ". . . has no impact on Design Bases Documents or FSAR text . . ."

Contrary to the above, three examples of failure to follow procedures were identified as follows:

- 1) Safety injection system Design Change Notice DCN W-31677-A, including Design Change Notice DCN F-34568-A, was closed without the required operating procedure changes being identified on the Operation Impact Review form. Consequently, the safety injection system operating instruction was not revised to address the addition of valves added by these Design Change Notices.
- 2) Advanced Authorization AA-01 Field Design Change Notice F-34568-A changed the function of safety injection system valve DRV-63-518

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in that the required valve position was changed from a normally closed drain valve to a normally open pressure relief path.

- 3) Design Change Notice DCN W-31677-A was approved as a Work Design Change Notice. This Design Change Notice required a change to Safety Injection System Design Bases Document system description in that the wording was changed on the method of preventing pressure locking of hot leg safety injection valve FCV-63-172.

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.

Dated at Atlanta, Georgia
this 12 day of May 1995