

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

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

During an NRC inspection conducted April 10 through May 13, 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, Instructions, Procedures, and Drawings, and Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 4, paragraph 6.1.1, require that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

TVA procedure EAI-3.05, Design Change Notices, Revision 18 requires that Q-DCNs disposition questions and provide clarification. Section 4.2 requires that DCNs shall not be used to provide a disposition to a nonconforming condition in lieu of a Significant Corrective Action Report (SCAR) or other Administrative Control Program (ACP). Appendix A, requires in part that appropriate reference documents (including ACP documents, vendor documents, etc.) be entered in block 9 of the Q-DCN form. Appendix M requires that the Q-DCN shall not be used to support changes to the plant, to identify discrepancies, or to support changes to input/output documents.

Contrary to the above, Q-DCNs 35720-A, 21591-A, 22575-A, 35541-A, 32973-A, 34120-A, and 20757-A did not implement the requirements of EAI-3.05 in that they specified changes to design input/output information and accepted nonconforming conditions for the following plant changes; (1) indentations, impressions, and arc strikes for piping, valve bodies, and fittings; (2) alternate bolting configurations and torque values for the mounting of Agastat relays; (3) mixed manufacturers conduit hardware for non 1-E systems; (4) response time for a safety related valve which differed from design requirements; and (5) alternate design configurations for cable tray support clips. Further, the Q-DCNs did not reference appropriate TVA corrective action documents, design documents, and supporting information.

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.

Enclosure 1

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20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at 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 31st day of May 1995