

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 June 1-30, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," the violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion V, "Instructions, Procedures, and Drawings," as implemented by TVA Nuclear Quality Assurance (NQA) Plan, TVA-NQA-PLN89-A (Revision 3), in Section 6.1, 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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Startup Manual Procedure 8.0 (Revision 8, dated May 21, 1993), "Administration of Preoperational Test Procedures," in Section 2.1.E requires that the following attribute will be verified by preoperational test instruction performance: "FSAR Chapter 14 test summary criteria specific to a design feature or function."

The stated objective of FSAR Chapter 14, Table 14.2-1, "Compressed Air System Test Summary," is to demonstrate the capability of the Compressed Air System to provide regulated air that is clean, dry, and oil free to instrumentation and control loads during normal plant operation and to vital equipment required for safe shutdown under design basis event conditions.

Preoperational Test Scoping Document TVA-27, "Control Air System," (Revision 3, Change Number 2; dated May 12, 1993) in Section 8.0 and Table 9-5 provides the acceptance criteria for the air cleanliness and oil free requirements of the Compressed Air System.

Contrary to the above, Preoperational Test Instruction 32.01 (Revision 0, dated May 17, 1993), "Control and Auxiliary Air System," did not contain test methods, test conditions and acceptance criteria to verify that the Control and Auxiliary Control air system design features are capable of providing regulated air that is clean and oil free.

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

- B. 10 CFR 50 Appendix B, Criterion III, "Design Control," as implemented by TVA Nuclear Quality Assurance (NQA) Plan, TVA-NQA-PLN 89-A (Revision 3), in Section 7.2, requires that measures shall be established to assure that applicable regulatory requirements and the design basis, as defined

in 10 CFR 50.2 and as specified in the license application, for those structures, systems, and components to which Appendix B applies are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled.

Engineering Administrative Instruction EAI-5.02 (Revision 3 dated September 10, 1992), "Preoperational and Acceptance Testing," in Appendix B, "Test Scoping Document Format and Content," and Appendix C, "Test Scoping Document Sources of Information," requires that Nuclear Engineering prepare design output documents (i.e., Test Scoping Documents) for structures, systems and components important to safety and that they are tested under the Watts Bar Preoperational Test Program to verify they can accomplish their intended safety functions. The test scoping document is used by the Startup and Test Group in the preparation of detailed preoperational test instructions.

Test Scoping Documents TVA-27 (Revision 3, Change 2, dated May 12, 1993), "Control Air System," and TVA-26 (Revision 2, Change 2, dated May 12, 1993), "Control and Auxiliary Control Air System," identify the tests for these compressed air systems. In Section 14.2.7 of its FSAR, the licensee committed to develop and conduct a test program in accordance with Regulatory Guide 1.68.3, "Preoperational Testing of Instrument and Control Air System," with certain exceptions.

Contrary to the above, on June 30, 1993, design controls and design output documents TVA-27, "Control Air System," and TVA-26, "Control and Auxiliary Control Air System," were determined to be inadequate in that the following tests of Section C to Regulatory Guide (RG) 1.68.3 (dated April 1982), "Preoperational Testing of Control Air Systems," had not been translated into design output documents.

- C.5 Establish by appropriate measurements or observations that the total air demand at normal steady state conditions, including leakage from the system, is in accordance with design.
- C.7 Verify by test that redundant components and air supplies are provided in the facility design to meet the single failure criterion. (In this case the pneumatic air supply is the mechanical part of C.7 which is not being tested for single failure criterion.)
- C.8 Testing should verify that the backup supplies for the protected loads supplied by the system (e.g., accumulators) will maintain sufficient air pressure to permit these loads to perform their design function.

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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 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 23rd day of July 1993