

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Units 1 and 2

Docket Nos. 50-390 and 50-391
License Nos. CPPR-91 and CPPR-92

During an NRC inspection conducted July 17 through August 21, 1993, 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, requires in part that activities affecting quality be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures. Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 3, Section 6.1.1 requires that quality-related activities shall be prescribed by documented procedures and instructions and shall be accomplished in accordance with these procedures and instructions.

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

1. Modification/Addition Instruction (MAI) 3.2, Cable Pulling For Insulated Cables Rated Up To 15,000 Volts, Revision 9, Appendix G requires that the ends of abandoned cables which are not terminated be insulated with tape or sealed with a Raychem end sealing kit. Abandoned cables shall also be identified and tagged in accordance with design drawings.

On July 19, 1993, work activities associated with workplan D-12070-129 were not accomplished in accordance with MAI 3.2, in that cable 1-3V-68-5661-B was not abandoned as required. All of the cable conductor ends were not sealed or insulated as required for abandoned cables and all conductors were lifted at both ends.

2. Site Standard Practice (SSP) 7.53, Modification Workplans, Revision 8, General Requirements for all workplans, requires that workplans contain installation requirements from approved design outputs. SSP 7.B., Control of Modification Work After Transfer, Revision 3., Appendices H and J requires that old program workplans be closed and a Remaining Work List be prepared to identify work to be transferred to a new work implementing document.

On July 19, 1993, workplan D-03002-02 did not incorporate the above SSP requirements in that it required the abandonment of

1-3V-68-5641 without this activity being identified in the approved design output document for D-03002-02 nor in the Remaining Work List for old program workplan K-P03002-A-1.

3. MAI 3.3, Cable Terminating, Splicing, and Testing For Cables Rated Up to 15,000 Volts, Revision 9, Section 6.2.2 requires that cable/wire lifts and lands be documented on Data Sheet 1.

On August 4, 1993, work activities were not accomplished in accordance with MAI 3.3, in that Data Sheet 1 (Cable/Wire Lift and Reland Data Sheet) was not used to document the lifting and relanding of several cables from workplans D-08672-13, D-08672-39, and D-08672-41.

4. MAI 3.3, Cable Terminating, Splicing, and Testing For Cables Rated Up to 15,000 Volts, Revision 9, Appendix D requires that bolted connections be tightened to values based on the bolt sizes specified in Attachment 3, Table C. Attachment 3, Table C requires torquing of 3/8 inch and 1/2 inch carbon steel bolts to 172-246 and 403-576 inch-pounds, respectively.

On August 12, 1993, work activities were not accomplished in accordance with MAI 3.3, in that 3/8 inch carbon steel bolts were torqued to 160 inch-pounds as documented in workplans D-08672-36, D-08672-39, and D-08672-41 and 1/2 carbon steel bolts were torqued to 400 inch-pounds as documented in workplans D-08672-13, D-08672-36, D-08672-39, and D-08672-41.

5. SSP 7.53, Modification Workplans, Revision 8, Section 2.6 requires that plant features be installed per the work instructions and design controlled output documents or approved design change documents. Workplan special instruction 500 for D-08672 series workplans required the performance of transformer polarization index tests as a series of post-maintenance electrical tests.

On August 4, 1993, work activities were not accomplished in accordance with SSP 7.53 in that transformer polarization index tests were not performed following completion of modifications. This condition was identified for the following workplans involving Class 1E 480 V shutdown transformers:

D-08672-10	D-08672-11	D-08672-12	D-08672-13
D-08672-14	D-08672-15	D-08672-16	D-08672-32
D-08672-33	D-08672-34	D-08672-35	D-08672-36

6. SSP 3.01, Quality Assurance Program, Revision 6, Section 2.5 requires that Quality Control inspections be performed in accordance with the approved work instructions or referenced procedures.

On August 4 and August 12, 1993, work activities were not accomplished in accordance with SSP 3.01, in that Quality Control inspections did not identify non-conforming conditions during the documentation of lifting and relanding of cables and torquing of bolts for transformers. These non-conforming activities were associated with workplans D-08672-13, D-08672-36, D-08672-39 and D-08672-41.

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 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 20 day of September 1993