

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 January 23 through February 19, 1994, 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, requires that activities affecting quality be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

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 in the following examples:

1. Site Standard Practice SSP-2.03, Administration of Site Procedures, Revision 11, Step 2.4.3.F, requires that a technical reviewer perform a technical review, using the Procedure Review/Verification Checklist, for each procedure revision. Appendix C, Procedure Review/Verification Checklist, Step 3.b, includes a check-off for "Referenced documents are applicable and valid."

Engineering Administrative Instruction EAI-1.02, Preparation and Control of Engineering Manual, Revision 2, Section 4.3, requires reviews for procedural content and adequate integration with other procedures.

As of February 17, 1994, reviews of procedure revisions resulted in the following procedures and instructions containing references to other site procedures or instructions that had been cancelled.

- EAI-3.09, Incorporation of Change Documents Into Drawings, Revision 9
- Maintenance Instruction MI-0.011, Safety/Relief Valve, Revision 13

9403280285 940316
PDR ADOCK 05000390
G PDR

- Plant Administrative Instruction PAI-10.05, Post Maintenance Test Program, Revision 4
- Startup Manual Procedure SMP-7.0, Control of System Cleanliness, Layup, and Flushing, Revision 6
- Technical Instruction TI-16, Plant Systems' Sampling and Chemical Criteria, Revision 37

In each case a major revision to the procedure had been processed since cancellation of the referenced procedures.

2. Modification Addition Instruction MAI-1.9, Walkdown Verification for Modifications, Revision 3, paragraph 1.0.B, requires that obvious deficient material conditions of plant systems/areas be identified during walkdowns.

On January 24, 1994, nine obvious deficient material conditions were identified by the NRC in areas of upper containment that the licensee failed to identify during the procedure MAI-1.9 walkdowns.

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 16th day of March 1994