

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 February 1 through February 28, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Criterion V of Appendix B to 10 CFR 50 and TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89A, Revision 3, Section 6.1 require that activities affecting quality be prescribed by documented instructions or procedures and be accomplished in accordance with these instructions or procedures.

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

1. Site Standard Practice SSP-7.53, Modification Workplans, Revision 11, requires Field Design Change Notices (FDCN) to be incorporated into workplans (WP). Section 2.7.C.1 requires the responsible engineer to list the FDCN number on the Modification Implementation Drawings list (Appendix D) so that field personnel can implement the change.

On April 23 and April 30, 1993, WPs D-01219-08 and D-01219-09 respectively were closed without the incorporation of FDCN F-20882-A, Advance Authorization AA-02. This resulted in the installation of safety-related cables 1V1038B and 1V1040B in a manner that was different from the configuration in the approved design output, Computerized Cable Routing System.

2. SSP-10.C, Evaluation of Installed Safety-Related Replacement Items, Revision 1, Section 2.5.5.A, states: "Commercial grade items intended for Safety-Related applications are acceptable for use in those applications only after the technical evaluation is complete and all the requirements for acceptance are met."

On September 23, 1993, Previous Procurement Substantiation Package 28627 was signed off as complete without the completion of required operability testing for commercial grade pump vanes installed in safety-related radiation monitors 0-RE-090-126, Main Control Room Normal Air Intake Monitor, and 1-RE-090-131, Containment Purge Air Exhaust Monitor.

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3. SSP-3.06, Problem Evaluation Reports, Revision 13, Appendix D, 10 CFR 50.55(e) Screening Form Guidelines For Potential Reportability Determination, question number II, requires that the adverse conditions identified on a problem evaluation report (PER) be identified as potentially reportable if the preparer cannot confirm that the affected system or component could have performed its required safety function, if left uncorrected. In addition, Appendix G, Guidelines for Completing PERs, states that a PER condition is considered potentially reportable if safety-related.

On February 11, 1994, SSP-3.06 was not followed when PER WBP940077 was determined to be not potentially reportable even though the pump vanes in question were for use in safety-related radiation monitors and the qualification of the pump vanes was indeterminate.

4. Technical Instruction TI-2007, Engineering Walkdown of Main Structural Steel Platforms/Miscellaneous Steel to Support the Civil Calculations Program, Revision 0, Instruction Changes IC-89-400 and IC-89-413, requires the documentation of discrepancies between the installed configuration of platforms and the inspection criteria specified in procedure TI-2007 and design drawings.

As of January 31, 1992, and February 14, 1994, the licensee had not adequately identified or documented deviations from design drawings and Procedure TI-2007 walkdown inspection criteria for the Boric Acid Batching Tank Access Platform and the Fuel Handling Area Exhaust Fan Platform, respectively. Deficiencies were identified by NRC inspectors for both platforms which were not identified or documented in walkdown packages WCG-1-833 and WCG-1-832, respectively.

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

- B. Criterion XVI of Appendix B of 10 CFR 50 and TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89A, Revision 3, paragraph 10.2.2, require that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

SSP-3.04, Corrective Action Program, specifies the acceptable methods for implementing the corrective action program at WBN. SSP-3.04 also specifies that SSP-3.06, Problem Evaluation Reports, fulfills the requirements to identify and track to closure the actions necessary to correct adverse conditions and provide recurrence control, if required, for adverse conditions documented on PERs.

Contrary to the above, the licensee failed to identify or resolve adverse conditions in the following examples:

1. The corrective action plan for PER WBP930415, which included the review of design change notice DCN P-01219 for incorporation of FDCNs, failed to identify or resolve that FDCN F-20882-A, and the associated advanced authorizations for work, had not been properly incorporated into workplans. This PER was closed on January 24, 1994.
2. The cause determination, extent of condition, corrective actions, and recurrence controls were inadequate for PER WBP920022 which was initiated for adverse conditions identified by the NRC on the Boric Acid Batching Tank Access Platform. A subsequent NRC walkdown of the Fuel Handling Area Exhaust Fan Platform identified similar discrepancies that had not been identified during a walkdown documented on calculation WCG-1-832. This PER was closed on May 26, 1993.
3. As of February 28, 1994, the disposition of adverse conditions identified during the conduct of civil/structural walkdowns were not documented. In addition, adverse conditions identified during these walkdowns were not properly resolved in accordance with the approved corrective action program. Examples included adverse conditions identified during walkdown WCG-1-832 for the Fuel Handling Area Exhaust Fan Platform, during the Walkdown Verification Program documented in the final report dated November 1, 1993, and during the walkdown of heating, ventilation, and air conditioning supports conducted in response to Ebasco Surveillance S-118.

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 30th day of March 1994