

*Original*

JUL 1 1994

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

Tennessee Valley Authority  
ATTN: Mr. Oliver D. Kingsley, Jr.  
President, TVA Nuclear and  
Chief Nuclear Officer  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Gentlemen:

SUBJECT: NOTICE OF VIOLATION  
(NRC INSPECTION REPORT NOS. 50-390/94-24 AND 50-391/94-24)

This refers to the NRC special inspection of the Instrument Lines Corrective Action Program (CAP) at the 75 percent implementation milestone conducted by M. M. Glasman on April 25 through May 6 and May 16 through May 20, 1994. The inspection included a review of activities authorized for your Watts Bar facility. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of instrument sensing and sampling lines associated with safety-related systems, or systems important to safety, and supports associated with these lines. In addition, during this inspection, calculations, procedures, and representative records were reviewed; interviews were held with personnel; quality assurance activities were reviewed; and observation of in-process work activities took place.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violations described in the enclosed Notice involved a violation for inadequate corrective actions to prevent recurrence of instrument sense line slope and separation deficiencies; a violation with three examples of inadequate design control, and a violation with five examples for failure to follow procedures.

Based on the results of this 75 percent milestone inspection we concluded that three of the five objectives of the Instrument Line CAP (fittings, thermally analyzed lines and bending) were being met in a satisfactory manner. However, the NRC has concerns pertaining to the adequacy of the two other objectives. Recurrence controls for previously identified slope and separation deficiencies were not completely effective in preventing the recurrence of these conditions, and a number of deficiencies were identified pertaining to design and installation of instrument line supports. Your response to the

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violations in which these two attributes are examples should clearly address the generic implications of this in addition to corrective action for the specific deficiencies.

In addition, the NRC has concerns pertaining to the adequacy of quality assurance audits that were conducted to assess the adequacy of this significant corrective action program. While the audits that were part of the Independent Verification Plan for the Instrument Lines CAP were effective in identifying numerous findings, these audits did not identify any adverse trends indicative of the numerous slope and support deficiencies cited in the attached inspection report. It is the NRC's expectation that problems of this nature be detected by your quality assurance organization in advance of major NRC inspections of corrective action programs.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and any reply will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,

*Original Signed By*  
*Johns P. Jaudon*

Johns P. Jaudon, Acting Deputy Director  
Division of Reactor Projects

Enclosures:

1. Notice of Violation
2. NRC Inspection Report  
w/Attachments A, B, C, D, and E

cc w/encl: (See page 3)

Tennessee Valley Authority

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cc w/encls:

Mr. Craven Crowell, Chairman  
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The Honorable Robert Aikman  
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The Honorable Garland Lanksford  
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bcc w/encls: (See page 4)

## Tennessee Valley Authority

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 A. F. Gibson, DRS/RII  
 J. P. Stohr, DRSS/RII  
 F. J. Hebdon, NRR  
 G. C. Lainas, NRR  
 A. P. Hodgdon, OGC  
 B. K. Keeling, GPA/CA  
 RII Coordinator, OEDO  
 P. S. Tam, NRR  
 NRC Document Control Desk

NRC Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 Route 2, Box 700  
 Spring City, TN 37381

## \*SEE PREVIOUS CONCURRENCES - ATTACHED

SEND	OFC	DRP/RII*	DRP/RII*	DRP/RII*	DRS/RII*	NRC Contractor*
TO	NAME	PFredrickson:vyg	GWalton	MGlasman	RChou	RMathew
PDR?	DATE	06/ /94	06/ /94	06/ /94	06/ /94	/ /94
Yes No	COPY?	Yes No	Yes No	Yes No	Yes No	Yes No
SEND	OFC	NRC Contractor*	NRC Contractor*			
TO	NAME	RDePriest	WMarini			
PDR?	DATE	06/ /94	06/ /94	/ /94	/ /94	/ /94
Yes No	COPY?	Yes No	Yes No	Yes No	Yes No	Yes No

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Tennessee Valley Authority

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bcc w/encls:

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P. Discussion: *Y. Cho*

SEND	OFC	DRP/RII	DR/RII	DRP/RII	DRS/RII	NRC-Contractor NRR
TO	NAME	PFredrickson:Vig	M. Gusman For Walton <i>note</i>	MGlesman <i>7/16</i>	RChou <i>10</i>	RMathew <i>RKM</i>
PDR?	DATE	06/30/94	06/29/94	06/29/94	06/30/94	06/29/94
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SEND	OFC	NRC-Contractor <i>NRR</i>	NRC Contractor			
TO	NAME	RDePriest <i>RDP</i>	MMarini <i>MM</i>			
PDR?	DATE	06/28/94	06/29/94	/ / 94	/ / 94	/ / 94
<input checked="" type="radio"/> Yes <input type="radio"/> No	COPY?	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No

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