

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

Docket No. 50-390
License No. CPPR-91

During an NRC inspection conducted May 8 through June 4, 1994, two 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. 10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires in part that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

Tennessee Valley Authority Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Revision 3, Section 6.1, Procedures and Instructions, 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.

Startup Manual Procedure (SMP) 8.0, Administration of Preoperational Test Instructions, Revision 14, paragraph 2.7, Equivalent Testing, states:

"2.7.1. Testing which adequately satisfies the requirements of FSAR Chapter 14 Test Summaries or other test requirements (i.e., generic tests, surveillance tests, functional tests on work orders, etc.) may be used to supplement a PTI or ATI, at the discretion of the Startup Manager upon coordination with the JTG."

and

"2.7.2. The equivalent test(s) shall be submitted for review and concurrence in accordance with the applicable portions of Subsection 2.3 prior to performance."

Contrary to the above, activities affecting quality were not accomplished in accordance with documented instructions or procedures, in that during Hot Functional Testing, the licensee elected to utilize a vendor procedure, Furmanite Procedure TT94016 via Work Order 94-10576-03, to satisfy the requirements of the Final Safety Analysis Report, Chapter 14, Test Summary for testing of the Main Steam Safety Valves. This was accomplished without the review and concurrence by the Joint Test Group prior to performance.

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

- B. 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires in part 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.

Tennessee Valley Authority Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 3, Section 6.1, Procedures and Instructions, 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.

Design Basis Document DBD-N3-63-4001, Safety Injection System Description, Revision 5, Step 6.5, SIP and CCP Suction Relief Valves Capacity and Pump Discharge and Miniflow Check Valve Testing, requires that, "The combined leakage through the discharge and miniflow check valves of any single SIP or CCP is limited to 25 gpm if the corresponding pump's suction relief valve capacity is only 25 gpm."

Site Standard Practice SSP-8.06, American Society of Mechanical Engineers, Section XI, Pump and Valve Inservice Testing, Revision 3, Section 4.0, Definitions, defines Category A valves as, "Valves for which seat leakage is limited to a specific maximum amount in the closed position for fulfillment of their required function(s)." Further, Appendix F, Inservice Testing Program Summary Description, Section 3.0, Valve Inservice Testing Program, states: "Valves in WBN's safety related systems were reviewed and categorized. Valves which were categorized as active in any category and passive valves categorized in Category A are listed in Table 2." Table 2 specifies the testing requirements for each valve identified. Finally, Appendix F, Section 1.0, Introduction, requires that, "The testing required by this program will be accomplished through the WBN Surveillance Testing Program."

Contrary to the above, Site Standard Practice SSP-8.06 was not followed in that the safety injection and centrifugal charging pumps' discharge and miniflow check valves had not been included in the American Society of Mechanical Engineers Section XI Pump and Valve Testing program as required by Site Standard Practice SSP-8.06, and as such, were not covered under the surveillance testing program.

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

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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 28th day of June 1994