

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 23 through May 24, 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. 10 CFR 50, Appendix B, Criterion V and the licensee's accepted Quality Assurance Program, TVA-NQA-PLN 89-A, "Nuclear Quality Assurance Plan", Revision 3, Section 6.1.2A1, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawing of a type appropriate to the circumstances and shall be accomplished in accordance with those instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Site Standard Practice 8.03, Post Modification Testing, Revision 7, establishes the administrative requirements and responsibilities for the Post Modification Test program at Watts Bar Nuclear Plant. Section 2.1.3. of this procedure assigns responsibility to Site Engineering for specifying required testing in the design change notice package per Engineering Administrative Instruction 3.05, Design Change Notices, Revision 15.

Engineering Administrative Instruction 3.05, Section 5.1.7.K, requires design change packages that change plant hardware include requirements for verification and testing to be designated on a test specification form. For preoperational acceptance tests affected by the design change, the design change package shall document the preoperational acceptance test scoping document change sheet numbers issued as a result of the design change. Additionally, Site Engineering is required to review and approve any testing instructions and test results involving modifications for which the test scoping document has been issued or changed.

Contrary to the above, as of December 3, 1993, design change notices M-15527-A, M-12321, M-21432, M-12067-A, and M-15645-A, which affected plant hardware, were approved without complying with the requirements of the above procedures. The DCN packages listed no post modification testing requirements on the test specification form. Additionally, for design change notice M-15527-A, the requirements for site engineering to review the test instructions and test results were documented as not

being required despite the design change having led to a revision in test scoping documents TVA-9 (Revision 4) and TVA-10 (Revision 3).

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

- B. 10 CFR 50, Appendix B, Criteria III, as implemented by the TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Revision 3, requires measures which assure that regulatory requirements and design basis are correctly translated into specifications, drawings, procedures, and instructions for safety-related nuclear plant structures, systems, and components.

System Description N3-32-4002, Compressed Air System, Revision 3, provides the design basis for the auxiliary control air system.

Contrary to the above, System Description N3-32-4002 was not translated into Alarm Response Procedure 131-137, Annunciation Response Instruction, Revision 0, for "AUX AIR TR-A MOISTURE HI" annunciator in that the procedure did not: 1) provide the alarm setpoint for moisture in the auxiliary control air system in the same units as used for the design basis as stated in the system description (i.e., percent relative humidity versus dewpoint); and 2) provide information that the alarm setpoint (approximately +22 degrees Fahrenheit) was greater than the design basis of -40 degrees Fahrenheit as stated in the system description.

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

- C. 10 CFR 50, Appendix B, Criteria XVI, as implemented by the TVA Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Revision 3, requires measures be established to ensure that items that do not conform to requirements are identified, evaluated, corrected, tracked, trended and, when required, reported to appropriate levels of management.

Modification and Addition Instruction 3.1, Installation of Electrical Conduit Systems And Conduit Boxes, requires that metallic conduit systems, whether embedded or exposed, shall be installed in accordance with those portions on the National Electric Code which ensures the system will be adequately grounded and electrically continuous to function as the equipment grounding conductor.

Problem Evaluation Report WBP930020, issued March 11, 1993, cited previous nonconforming problems with grounding. The corrective actions required reverification of ground adequacy, and the problem evaluation report was field verified complete on May 12, 1993.

Contrary to the above, as of December 3, 1993, the licensee failed to include inspection and correction of grounding strap deficiencies in the corrective actions Problem Evaluation Report WBP930020 for the 125 volt ac system.

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 21st day of June 1994