

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority  
Watts Bar Nuclear Plant

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

During an NRC inspection conducted on May 23-27, and June 13-17, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," the violation is listed below:

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, and shall be accomplished in accordance with these instructions, procedures, or drawings.

Final Safety Analysis Report (FSAR) Section (§), 14.2 and Table 14.2.1, Post Accident Sampling System Test Summary, details, in part, preoperational tests conducted to verify that samples collected under post accident conditions can be obtained and safely transported to a transfer point for offsite analysis. The test requires, in part, that sample carts/casks are verified to be operational.

SMP-14.0, Test Deficiencies, Revision (Rev.) 1, dated February 14, 1994, requires, in part, that during the conduct of a Preoperational Test Instruction (PTI) a Test Deficiency Notice (TDN) is to be initiated at the time a failure of a procedural step occurs. A step is considered to fail when the equipment or action does not perform as written.

PTI-043-01, Post Accident Sampling System, Rev. 1, dated March 29, 1994, requires a reactor coolant system (RCS) sample to be obtained and transported to a transfer station or onsite laboratory for analysis. Specifically, Step 6.5.113 requires an undiluted RCS to be collected in the undiluted sample cask/cart and subsequently transported to the new fuel cask loading bay for offsite analysis.

Contrary to the above, on May 27, 1994, the licensee failed to issue a TDN for a Post Accident Sampling System (PASS) test deficiencies identified after placing a vial containing a simulated PASS RCS sample into the undiluted sample cask/cart and subsequently transferring the equipment to the cask loading (Railroad) bay transfer point. Specific test deficiencies which indicated failure of the cask/cart transfer equipment included the following examples:

1. Liquid of an undetermined origin was observed on the undiluted transfer cask following completion of liquid PASS panel reactor coolant collection and placement of the sample vial into the cask/cart.

2. The undiluted cask/cart hydraulic lines required to introduce or to retrieve the liquid sample vial automatically from the cask were damaged during movement of the cart over the PASS room door threshold rendering the equipment inoperable.
3. Difficulties in aligning and moving the undiluted sample cask/cart over door thresholds (jams) between the PASS facilities and the Railroad Bay were experienced, and for one segment of the transfer, the licensee did not use the portable ramp specifically fabricated for moving the equipment over the door threshold.

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

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 at the facility that is the subject of this Notice 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 15th day of July 1994