

APPENDIX A
NOTICE OF VIOLATION

Tennessee Valley Authority

Docket Nos. 50-259, 50-260, 50-296
50-327, 50-328
50-390, 50-391
50-438, 50-439

Browns Ferry 1, 2 and 3
Sequoyah 1 and 2
Watts Bar 1 and 2
Bellefonte 1 and 2

License Nos. DPR-33, DPR-52, DPR-68
DPR-77, DPR-79,
CPPR-91, CPPR-92,
CPPR-122, CPPR-123

As a result of the inspection conducted on November 7-10, 14-18, and December 9, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

1. 10 CFR 50 Appendix B, Criterion I, requires that persons and organizations performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems, to recommend solutions, and to verify implementation of solutions. Criterion XVI further requires that measures shall be established to assure conditions adverse to quality are promptly corrected. The accepted QA Program (TVA-TR75-1A), Section 17.0.3, states that the Office of Quality Assurance is responsible for establishing and ensuring effective execution of an overall integrated quality assurance program for TVA. It also states that OQA may identify quality problems; initiate, recommend, or provide solutions through designated channels; verify implementations of solutions; determine the adequacy of facilities and equipment to carry out approved procedures and instructions; and issue special instructions necessary to execute its responsibilities. Section 17.2.16 states that adverse conditions are evaluated, reported to supervision, and corrected in a manner consistent with their safety.

Contrary to the above, OQA is not ensuring effective execution of the quality assurance program in that all conditions adverse to quality have not been promptly corrected. The current Composite Open Item Review Summary contains one outstanding item from 1979, 16 outstanding items from 1981 and 65 outstanding items from 1982. Region II has issued four violations since February 1981, for failure to take prompt corrective action by mechanisms defined within the QA Program.

This is a Severity Level IV Violation (Supplement I). Similar items relative to corrective action inadequacies were brought to your attention in our letters dated February 13, 1981; March 18, 1981; April 29, 1982; and August 24, 1983.

2. 10 CFR 50 Appendix B, Criterion III, and the accepted QA Program require establishing measures to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions. In addition, Criterion III requires measures to identify and control design interfaces and to coordinate among participating Design organizations. Section 17.1.3.2 and 17.2.3.3 of the accepted QA Program (TVA-TR75-1A) collectively require formal control and coordination of all design criteria involving groups both internal and external to TVA. The program endorses Regulatory Guide 1.64 and ANSI N45.2.11-1974. Section 5 of this standard specifically requires formal documentation of all internal and external design control interfaces.

Contrary to the above, measures have not been established to implement these requirements for all nuclear plant design activities. TVA Audit 83V-26 performed in February 1983 revealed several problems involving the transfer of design information between TVA and Gilbert Associates related to safety-related piping analysis. Problems identified during this audit included: (1) failure to formally transmit certain design inputs and outputs on the Sequoyah, Watts Bar, and Bellefonte projects; (2) failure to notify Gilbert of nonconformances identified by TVA; (3) inadequate documentation by Gilbert of the design baseline for input and output data; (4) different methods of handling design data in the Sequoyah, Watts Bar, and Bellefonte project groups within the EN DES Civil Engineering Branch; and (5) the use of unverified computer programs. Similar problems were identified by the QA staff during TVA Audit 83V-73 conducted in September 1983 which also involved pipe stress analysis performed for TVA by a different contractor. As of this inspection, action had not been taken to determine the full scope of this problem within all TVA groups performing design activities and measures had not been established which require formal documentation of all internal and external design interface activities.

This is a Severity Level IV Violation (Supplements I and II).

3. Browns Ferry Technical Specification (TS) 6.10.C requires that audits be forwarded to the Manager of Power and to the management positions responsible for the areas audited within 30 days after completion of the audit. Sequoyah Technical Specification 6.5.1.10.C contains the same requirement. The licensee's accepted QA Program (TVA-TR75-1A) Tables 17D-1, 17D-2, and 17D-3 endorse Regulatory Guide 1.144 and ANSI N45.2.12, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants. Paragraph 4.4.6 of this standard contains essentially this same requirement.

Contrary to the above, the following audits were not forwarded as required by TS or ANSI N45.2.12 within 30 days after completion of the audit:

<u>Audit</u>	<u>Audit Completion Dates</u>	<u>Issue Date</u>
BF-83TS-10	7/21/83	8/29/83
SQ-83TS-11	8/4/83	9/13/83
CH-83TS-03	9/2/83	10/21/83
CH-8300-06	9/30/83	Not issued as of 11/15/83

<u>Audit</u>	<u>Audit Dates</u>	<u>Issue Date</u>
CB-83-05	8/12/83	9/22/83
CB-83-06	8/29/83	10/04/83
CB-83-07	9/29/83	Not issued as of 11/09/83
83V-26	3/17/83	4/26/83
83V-58	7/14/83	8/26/83
83V-72	9/23/83	Not issued as of 11/09/83
83V-73	9/14/83	10/26/83
83V-75	9/29/83	Not issued as of 11/09/83
83V-78	9/29/83	Not issued as of 11/09/83
83V-79	7/14/83	8/22/83
QDBVA-84-1	10/05/83	Not issued as of 11/08/83

This is a Severity Level IV Violation (Supplements I and II). A similar item was brought to your attention in our letter dated August 24, 1983.

4. 10 CFR 50 Appendix B, Criterion XVIII, and the licensee's accepted QA Program (TVA-TR75-1A) Section 17.2.18 collectively require a comprehensive system of planned and periodic audits to verify compliance with all aspects of the quality assurance program. Tables 17D-1, 17D-2 and 17D-3 of the QA program endorse Regulatory Guide 1.144 and ANSI N45.2.12, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants. Paragraph 4.5.1 of this standard requires management of the audited organization to respond in writing within 30 days after receipt of the audit report.

Contrary to the above, the following audit responses were not submitted by the audited organization within 30 days.

<u>Audit</u>	<u>Date Issued</u>	<u>Date Responded</u>
BF-8300-03	9/22/83	11/3/83
SQ-83TS-11	9/13/83	10/25/83
SQ-83TS-09	8/17/83	9/22/83
83V-79	8/22/83	No response as of 11/09/83

This is a Severity Level IV Violation (Supplements I and II). Similar items were brought to your attention in our letters dated February 13, 1981, and August 24, 1983.

5. 10 CFR 50 Appendix B, Criterion II, states that the quality assurance (QA) program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. The accepted QA Program (TVA-TR75-1A) requires an indoctrination and training program for personnel performing quality related activities. Tables 17D-1, 17D-2 and 17D-3 endorse Regulatory Guide 1.146 and ANSI N45.2.23-1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants. Paragraph 2.2 of this standard requires the auditing organization to

establish audit personnel qualifications and Paragraph 2.3 requires a scoring system involving verification of a minimum of ten credits prior to being designated a Lead Auditor.

Contrary to the above, measures had not been established to require verification of the minimum credits needed to be a Lead Auditor.

This is a Severity Level IV Violation (Supplements I and II).

6. 10 CFR 50 Appendix B, Criterion XVII, requires maintaining sufficient records to furnish evidence of activities affecting quality. The records shall include closely-related data such as qualifications of personnel. The accepted QA Program (TVA-TR75-1A) addresses similar requirements and endorses Regulatory Guide 1.88 and ANSI N45.2.9, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants. This standard requires maintaining qualification and training records of personnel performing safety-related activities.

Contrary to the above, records were not maintained to demonstrate that all auditors and lead auditors were qualified to perform safety-related QA audits. Specific examples identified during the inspection involved missing records, failure to establish records, and incomplete records for lead auditors.

This is a Severity Level V Violation (Supplements I and II).

7. 10 CFR 50 Appendix B, Criterion XVIII, establishes requirements for conducting audits of the quality assurance program. The accepted QA Program (TVA-TR75-1A) Tables 17D-1, 17D-2 and 17D-3 collectively endorse Regulatory Guide 1.144 and ANSI N45.2.12, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants. Paragraph 4.4.3 of this standard requires the audit report to identify persons contacted during pre-audit, audit, and post-audit activities.

Contrary to the above, measures had not been established which require audit reports to provide identification of persons contacted during the audit.

This is a Severity Level V Violation (Supplements I and II).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: JAN 16 1984