

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2, and 3

Docket Nos. 50-259, 50-260, and 50-296
License Nos. DPR-33, DPR-52, and DPR-68

During the Nuclear Regulatory Commission (NRC) inspection conducted on April 16 - May 18, 1990, two violations of NRC requirements were identified. The first violation involved failure to perform independent verification. The second violation with two examples was for failure to implement procedures and drawings. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

- A. Technical Specification Section 6.8.1.1a requires that written procedures be established, implemented, and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33 includes administrative procedures for bypassing safety functions and jumper control.

TVA Nuclear Power Standard STD-10.1.53, Control of Temporary Alterations, requires that independent verification be performed for temporary alteration installation and removal. Wire lifts are included as an example of a temporary alteration.

Plant Managers Instruction 8.1, Temporary Alterations, requires that independent verification be performed for the lifting and relanding of electrical leads.

Contrary to the above, on April 3-4, 1990, during the performance of work order 90-02259, various conductor determinations were performed without independent verification prior to conducting high potential testing of low voltage cable in accordance with special test ST-90-01.

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

- B. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and be accomplished in accordance with the instructions, procedures, or drawings.

TVA Nuclear Quality Assurance Plan TVA-NQA-PLN89, Section 6.2, establishes the requirements for control and use of procedures, instructions, and drawings.

1. TVA General Construction Specification G-38, Specification Revision Notice (SRN) G-38-69, Section 3.2.1.1.b, states, "Pullpoints (i.e., condulets, other than "C" condulets used to inject lubricant,

manholes) shall not be bypassed when pulling cables unless authorized by Nuclear Engineering."

Contrary to the above, on April 28-29, 1990 during the performance of a multiple cable pull being made under DCN #W5547, cables ES325-I, ES350-I, ES363-I, K307-I, ES825-I, and ES833-I were pulled bypassing two pull points without Nuclear Engineering authorization.

2. Plant drawing 010608064-1 specifies the wiring connections for the shutdown board degraded voltage logic circuit.

Contrary to the above, on April 20, 1990 during high potential voltage testing of conductors, two conductors from cable E54082-IIC were found not connected per the plant drawing. Once an engineering evaluation was performed, the conductors were connected per the drawing which resulted in an inadvertent diesel generator start during testing.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Browns Ferry, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION


Bruce A. Wilson, Chief
TVA Projects

Dated at Atlanta, Georgia
this 14th day of June 1990