

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah 1 and 2

Docket Nos. 50-32⁷~~0~~, 50-32⁸~~4~~
License Nos. DPR-77, DPR-79

As a result of the inspection conducted on July 12-16, 1982, and in accordance with the NRC Enforcement Policy, '7 FR 9987 (March 9, 1982), the following violations were identified.

- A. 10 CFR 50 Appendix B Criterion XVI and the accepted QA Program (TVA-TR75-1A, Revision 4) Section 17.2.16 require that measures be established to assure that conditions adverse to quality are promptly corrected.

Contrary to the above, measures have not been established to assure that sufficient management attention is provided to promptly correct conditions adverse to quality such as QA audit findings. Procedures have not been established to require that unresolved quality issues are elevated to successively higher levels of management when audit responses or corrective actions by the audited organization do not produce acceptable results. Although not a complete list, the two QA audits below are examples of problems identified over a year ago for which corrective action has not been achieved.

1. Audit OPQAA-SQ-81-1 conducted January 7-16, 1981, identified in finding A-1 that maintenance requests (MRs) were not being reviewed by the plant QA staff prior to issuance as required by the Operations Quality Assurance Manual. Reinspection by the QA staff in this area indicates that this problem is still recurring. Corrective action for this item was originally scheduled for completion by June 1981.
2. Audit OPQAA-SQ-81TS-04 conducted April 13-23, 1981, identified eight findings involving the Radiological Emergency Plan. The audited organization did not respond to findings A-1, 3, 5 and 7 until the failure to respond was identified in a separate audit conducted in October 1981. Actions to correct these items were originally scheduled for completion by November 1981. As of this inspection, the corrective action for finding A-5 had not been completed.

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

- B. 10 CFR 50 Appendix B Criterion II and the accepted QA Program (TVA-TR75-1A, Revision 4) Section 17.2.2 state that the program shall be documented by written policies, procedures or instructions and shall be carried out throughout plant life. Section 17.2.2 also states that the Office of Power

Quality Assurance Manual (OQAM) contains procedures which implement the accepted QA Program. 10 CFR 50 Appendix B Criterion VI and the accepted QA Program Section 17.2.6 require that measures be established to assure that documents are used at the location where the prescribed quality activity is performed.

Contrary to the above, measures have not been established to assure that written procedures implementing the quality assurance program are used throughout plant life at the location where prescribed quality activity is performed. Managerial controls have not been established to assure that each OQAM procedure has been evaluated to determine its applicability and factored into the appropriate plant functional area. In addition, a system has not been established to assure that revisions to the OQAM are implemented.

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

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: August 20, 1982