

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry

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

As a result of the inspection conducted on November 30 - December 4, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. 10 CFR 50.55a(g) requires the licensee to comply with the requirements of ASME Section XI. ASME Section XI requires the preparation of specified inservice inspection reports which must be maintained as plant records and must be filed with the NRC within 90 days of completion of each inservice inspection.

Contrary to the above noted requirements, the specified inservice inspection reports were apparently not prepared, maintained as records, or furnished to the NRC within the required 90 days for inservice inspections performed during the following plant outage dates for Units 1 and 3:

Unit 1	-	Outages of 9/13/77 to 1/15/78 and 1/3/80 to 3/22/80
Unit 3	-	Outages of 9/8/78 to 11/25/78 and 11/23/80 to 1/18/81

This is a Severity Level V Violation (Supplement II.E.). This applies to Units 1 and 3 only.

- B. 10 CFR 50, Appendix B, Criterion V, as implemented by the Topical Report, TVA TR 75-01 paragraph 17.2.5, requires the licensee to prescribe activities affecting quality in documented instructions, procedures or drawings which include appropriate acceptance criteria for determining that the activities have been satisfactorily accomplished.

Contrary to the above, the licensee did not have a work or inspection document to prescribe the means of installing, securing, and inspecting the necessary locking devices on the main steam isolation valves locking plate fasteners.

This is a Severity Level V Violation (Supplement II.E.).

- C. 10 CFR 50, Appendix B, Criterion IX, as implemented by the Topical Report, TVA TR 75-01 paragraph 17.2.9, requires the licensee to control and accomplish special processes, such as radiographic examination of welds, using qualified procedures in accordance with applicable codes.

Contrary to the above, the licensee did not control and accomplish radiographic examination of welds in accordance with their procedure (N-RT-1) and its referenced code requirements as indicated by the following examples of

inadequate performance of radiographic examination steps for weld TP-1-H in a safety-related main steam tail pipe:

(1) Procedure N-RT-1 specifies weld acceptance requirements which necessitate evaluation of radiographically detected linear indications exceeding 3/4 inch in length. Weld TP-1-H was accepted without evaluation of a 1½ inch long linear indication that appeared on the film for the weld.

(2) Informed of the above radiographic indication by an NRC inspector, the licensee performed grinding on and re-radiographed a portion of the subject weld to evaluate its acceptability. However, the licensee failed to properly identify the location of the indication in accordance with means given in procedure N-RT-1, and as a result, the wrong area was evaluated and was accepted.

This is a Severity Level V Violation (Supplement II.E). This applies to Unit 1 only.

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 violation; (2) the reasons for the violation 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. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: **JAN 12 1982**