

APPENDIX A  
NOTICE OF VIOLATION

Tennessee Valley Authority  
Browns Ferry 1, 2 & 3

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

As a result of the inspection conducted on September 3, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. 10 CFR 50, Appendix B Criterion XVIII requires that a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program. Table 17.2-5 of the accepted QA Program endorses the requirements of ANSI N45.2.12, Draft 3, Revision 4 - February 1974, for auditing of quality assurance programs. Section 4.3.2.3 of this Standard requires that selected elements of the program be audited to the depth necessary to determine whether or not they are being implemented effectively. The accepted QA Program, TVA-TR75-1A Revision 5, Section 17.2.18 states that audits shall be conducted to ensure compliance with training requirements.

Contrary to the above, the training program was not audited to the depth necessary to determine whether or not the program is being implemented effectively in that Audit OPQAA-CH-82TS-01 dated April 12 - May 7, 1982, identified only one failure to follow training program procedural requirements when in fact multiple failures existed as identified in Violation B below. This audit stated in the overall assessment section that implementation of the general employee training program was inadequate; however, this was not identified as a finding and as a result the audited organization did not take any action to correct this inadequacy.

This is a Severity IV Violation (Supplement I).

- B. 10 CFR 50, Appendix B Criterion V and Section 17.2.5 of the accepted QA Program require that activities affecting quality shall be prescribed in procedures and shall be accomplished in accordance with those procedures. Activities affecting quality were not accomplished in accordance with procedures in that:
1. Standard Practice BF 4.5, Plant General Employee Training Program, dated June 23, 1982, requires that personnel who do not receive retraining have their unescorted access badges pulled. This requirement was instituted as a result of a violation identified in IE Reports 50-259, 260, 296/81-02 dated March 18, 1981. This violation identified that all personnel had not received required general employee training.

Contrary to the above, a review of training records of site personnel indicates greater than 10% of these people have not received all required training and have not had their unescorted access badges pulled. This is similar to the violation identified in IE Reports 50-259, 260, 296/81-02.

2. Standard Practice BF 4.5 requires that the outage organization train all outage annual personnel.

Contrary to the above, of 147 outage annual personnel training records reviewed, a total of 106 of these people had not received all required general employee training. These records included 13 out of a total 21 general foremen that had not received QA/QC indoctrination or training.

3. Operational Quality Assurance Manual (OQAM) Part III, Section 6.1, Selection and Training of Personnel of Nuclear Power Plants, dated June 15, 1981, paragraph 1.5.1 requires a continuing program for training of replacement personnel and for retraining necessary to ensure that personnel remain proficient.

Contrary to the above, there are no plant procedural requirements to assure proficiency is maintained in areas of QA/QC indoctrination, standard practices and plant instructions, document control and authorization of work performance, temporary conditions, plant modifications, and procurement and material control. Retraining is not being provided in these subjects and a method has not been established to determine that proficiency is being maintained in these areas as required by the OQAM.

4. OQAM Part III, Section 6.1 paragraph 1.5.1 requires that training programs be kept up to date to reflect plant modifications and changes to procedures.

Contrary to the above, plant procedural requirements do not specify that the training department receive information on plant modifications or changes to procedures.

This is a Severity Level IV Violation (Supplement I). The examples cited above are not all inclusive.

- C. 10 CFR 50, Appendix B Criterion II and the accepted QA Program, Section 17.2.2, require a training and indoctrination program to assure that personnel responsible for performing quality-affecting activities are instructed as to the purpose, scope, and implementation of the quality assurance program.

Contrary to the above, a training and indoctrination program has not been provided to assure that all personnel responsible for performing quality-affecting activities are instructed as to the purpose, scope, and implementation of the quality assurance program in that:

1. There are no requirements to train temporary outage craftsmen in the QA program requirements.
2. The training program described in Standard Practice 4.5 allows a period of six months to complete all required general employee training; however, measures have not been provided to assure that craft personnel have received the required QA indoctrination prior to performing quality-affecting activities.

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: September 20, 1982