

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah

Docket Nos. 50-327, 50-328
License Nos. DRP-77, DRP-79

During the Nuclear Regulatory Commission (NRC) inspection conducted on January 25 - March 17, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion V, and the licensee's accepted Quality Assurance (QA) program (TVA Topical Report TVA-TR75-1A, Section 17.2.5) require that "Activities affecting Quality be prescribed by documented procedures or drawings and be accomplished in accordance with these procedures or drawings." Procedures and drawings were not followed for installation and inspection of high strength bolts in seismic restraints added to the movable incore transfer device per recommendations of IE Information Notice 85-45.

1. Engineering Change Notice (ECN) L6447, implemented by Work Plan 11672, required installation of A-325 high strength bolts in the braces (seismic restraints) added by the ECN to restrain the movable incore transfer device during a seismic event.

Contrary to this requirement, A-307 medium strength bolts were installed in the seismic restraints.

2. TVA Sequoyah Modification and Addition Instruction M&AI-9, Tightening, Inspection, and Documentation of Bolted Connections requires licensee inspectors to visually inspect new bolted connections and verify that the correct type of bolts and nuts were installed in the connections.

Contrary to these requirements, licensee inspectors failed to identify that the improper type (A-307) bolts were installed in the connections on the new seismic restraints. Inspection records in the work plan package were incorrectly signed off to indicate that the proper type (A-325) bolts were used in the connections.

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

- B. 10 CFR 50, Appendix B, Criterion XVI, and the licensee's accepted QA program (Section 17.2.16) require that conditions adverse to

quality, such as deficiencies, deviations, and nonconformances, be promptly identified, and corrected. 10 CFR 50, Appendix B, Criterion XVII, and the licensee's accepted QA program (Section 17.2.17) require that the licensee establish requirements concerning retention of quality assurance records, such as duration, location, and assigned responsibility. Procedure NQAM III, Section 4.1 and referenced ANSI N45.2.9-1974 require quality assurance records to be stored in facilities which will protect the records from possible destruction by causes such as fire, flooding, tornadoes, insects, rodents, and extreme variations in temperature and humidity.

Contrary to the above, a deficiency pertaining to inadequate storage of quality records was identified on Corrective Action Report (CAR) 86-024 on May 12, 1986. The licensee has failed to take prompt corrective action to correct this deficiency which is evidenced by fact that the CAR still remains open, and that the deficiency (improper storage of quality records) still exists. In excess of 200 work plan packages were stored on open shelves in a facility (a trailer) which did not protect the records from possible destruction by cause such as fire, flooding, tornadoes, insects, rodents, and extreme variations in temperature and humidity. The work plan packages document physically completed modifications to various safety related structures, systems and components and contained quality assurance records which furnish evidence of identification and control of materials, parts and components, documentation of completed inspections, control of special processes, and inspection, test and operating status. These quality assurance records had been stored in this trailer in excess of six months. Duplicate copies of these records were not available.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is 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, Sequoyah, 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 [for each violation]: (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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

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4

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Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

FOR THE NUCLEAR REGULATORY COMMISSION

William Little — for

Kenneth P. Barr, Acting Assistant
Director for Inspection Programs
TVA Projects Division
Office of Special Projects

Dated at Atlanta, Georgia
this *17th* day of *May* 1988