

Tennessee Valley Authority, Post Office Box 2000, Soddy Daisy, Tennessee 37379-2000

Masoud Bajestani  
Site Vice President  
Sequoyah Nuclear Plant

February 22, 2000

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

10 CFR 2.201

Gentleman:

In the Matter of ) Docket Nos. 50-327  
Tennessee Valley Authority ) 50-328

**SEQUOYAH NUCLEAR PLANT (SQN) - NRC INTEGRATED INSPECTION  
REPORT 50-327, 50-328/99-04 - REPLY TO NOTICE OF VIOLATION  
(NOV)**

This letter and its enclosure provide TVA's reply to the subject NOV. The NOV contains one violation as documented in your letter to Mr. J. A. Scalice, dated January 26, 2000. The violation addresses the failure to include the site storm drain system in the Maintenance Rule Program scope.

This submittal does not contain any commitments. If you have any questions regarding this response, please contact me at extension (423) 843-7001 or P. Salas at extension (423) 843-7170.

Sincerely,



M. Bajestani

Enclosure

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cc (Enclosure)

Mr. R. W. Hernan, Project Manager  
Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852-2739

NRC Resident Inspector  
Sequoyah Nuclear Plant  
2600 Igou Ferry Road  
Soddy-Daisy, Tennessee 37379-3624

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, Georgia 30303-3415

ENCLOSURE

TENNESSEE VALLEY AUTHORITY  
SEQUOYAH NUCLEAR PLANT (SQN)  
UNITS 1 AND 2

INSPECTION REPORT NUMBER 50-327, 50-328/99-04  
REPLY TO NOTICE OF VIOLATION (NOV)

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I. RESTATEMENT OF VIOLATION

"During an NRC inspection conducted on June 1, 1999 through July 17, 1999, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedures for NRC Enforcement Actions,' NUREG-1600, the violation is listed below:

10 CFR 50.65(a)(1) requires, in part, that the holders of an operating license shall monitor the performance or condition of structures, systems, or components within the scope of the rule as defined by 10 CFR 50.65(b) against licensee-established goals, in a manner sufficient to provide reasonable assurance that such structures, systems, or components are capable of fulfilling their intended functions. Such goals shall be established commensurate with safety. When the performance or condition of an structure, system, or component does not meet established goals, appropriate corrective action shall be taken.

10 CFR 50.65(b)(2) requires, in part, that the holders of an operating license shall include, within the scope of the monitoring program specified in 10 CFR 50.65(a)(1), non-safety related structures, systems, or components whose failure could cause a reactor scram or actuation of a safety-related system.

Contrary to the above, as of July 10, 1996, the licensee failed to include the storm drain system in the Maintenance Rule Program. A July 11, 1994, flooding event of the turbine building railway bay area provided the licensee sufficient operating experience to support the possibility that failure of the Storm Drain System, a non-safety related system, could cause a reactor scram or actuation of a safety-related system, due to wetting of the 6.9kv unit boards which were in the flooded area."

## TVA's REPLY TO THE VIOLATION

### 1. Reason For The Violation

The determination to not include the site storm drain system in the Maintenance Rule Program was based on the following considerations:

- The nonsafety-related storm drain system was not viewed as capable of directly affecting a safety-related function. Therefore, TVA concluded that industry guidance (NEI 93-01) did not require it to be within the Maintenance Rule Program scope.
- Past Maintenance Rule Expert Panel meetings considered the scoping of the storm drain system. On two separate occasions the panel reviewed plant and industry history and corrective actions from previous events. The panel concluded that plant scram potential was too small for consideration and excluded it from the Maintenance Rule Program scope.
- Review of plant operating experience showed that past railroad bay flooding had caused no actual scram or safety-related system actuation.
- The Final Safety Analysis Report assumes the storm drain system is clogged and does not function.

Because the past storm drain system performance did not directly cause a scram or a safety-related system actuation event, we elected not to include the storm drain system in the Maintenance Rule Program.

### 2. Corrective Steps Taken And Results Achieved

A steel curb has been installed which runs the length of the turbine building railroad bay, enclosing the perimeter of the 6.9 kilovolt unit boards while providing maintenance access to the boards. The curb height of approximately 9 inches was judged to be sufficient based on the past flooding history of approximately 2 inches at the board base. This curb is expected to mitigate

rain water intrusion to the unit board area of the turbine building railroad bay.

The circumstances associated with the subject NOV were reviewed by the site Maintenance Rule Expert Panel and the storm drain system has been added to the Maintenance Rule Program scope. Addition of this system to the Maintenance Rule Program will result in continued monitoring of system performance and ensure appropriate attention is placed on the system.

**3. Corrective Steps That [Have Been Or] Will Be Taken To Prevent Recurrence**

No additional actions are necessary relative to the cause of the violation.

**4. Date When Full Compliance Will Be Achieved**

With respect to the violation, TVA is in full compliance.