



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

NOV 25 1991

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

Gentlemen:

In the Matter of)	Docket Nos.	50-259	50-390
Tennessee Valley Authority)		50-260	50-391
)		50-296	50-438
)		50-327	50-439
)		50-328	

SAFETY EVALUATION ON THE TVA CORRECTIVE ACTION PLAN (CAP) DEVIATION PROCESS AND SUPPLEMENT TO SAFETY EVALUATIONS ON THE TENNESSEE VALLEY AUTHORITY EMPLOYEE CONCERNS SUBCATEGORY REPORTS - BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3 AND SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2 (TAC NOS. 76941, 76942, AND 76944)

The purpose of this letter is to provide TVA's justification for the subject CAP deviating from the original CAP for Corrective Action Tracking Document (CATD) 223.03-SQN-01 and to provide TVA's position on two questions involving the ECSP.

The revised CAP for CATD 223.03-SQN-01 commits to (1) initiate procedures to implement the Vendor Seismic Qualification Documentation Retrieval (VSQDR) Program, and (2) initiate procedures to implement ER-SQN-EEB-001 with a scheduled completion date of March 1, 1990. TVA's justification for the revised CAP is contained in the enclosure to this letter. Subcategory report 22303 included a statement that seismic adequacy of the remaining field-mounted instruments would be evaluated prior to Unit 1 restart. This reflected the activity schedule at the time of the submittal and was not tied to restart based on any technical evaluation. This activity was also addressed separately under the Nuclear Performance Plan (NPP) activities as a postrestart commitment. The resolution approach was not called out as a separate commitment in the CATD Corrective Action Plan. Accordingly, it was not considered a commitment because TVA has only committed to close each CATD by completing the associated CAP.

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In general terms, the Employee Concerns Special Program (ECSP) was not intended to be a long term program but one which would only be used in restoring the Nuclear Program to normal operations. We have, by virtue of restarting SQM and BFN, restored our programs at these two sites, and we are in the process of reverting back to normal operations and will not continue to track corrective actions under the ECSP after the actions are completed. We will consider Watts Bar to have reached that point when NRC issues an operating license for Unit 1 of that plant, the unit has been successfully started, and post startup testing has been completed.

Please telephone T. L. Pitts at (615) 751-8087 regarding any questions relative to this submittal.

Sincerely,


E. G. Wallace, Manager
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Enclosure

cc: See page 3

U.S. Nuclear Regulatory Commission

Enclosure

cc (Enclosure):

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ENCLOSURE

JUSTIFICATION

Justification for the corrective action plan (CAP) deviation to the Corrective Action Tracking Document (CATD) 223.03-SQN-01 consists of the following:

1. TVA established the seismic adequacy of field-mounted instruments for the Sequoyah Unit 2 restart boundary prior to Unit 2 restart in accordance with the original CAP and Phase 1 implementation of the Instrument Project.
2. TVA established the seismic adequacy of field-mounted instruments for the Sequoyah Unit 1 restart boundary prior to Unit 1 restart in accordance with the original CAP and Phase 2 implementation of the Instrument Project.
3. TVA implemented the corrective action for CATD 223.03-SQN-01 under the instrument project. NRC was notified of TVA's CAP for the instrument project on September 22, 1987. The CAP was implemented in two phases (commonly referred to as Phases I and II of the instrument project). Phase I covered instrumentation required for safety system operation, and Phase II covered other Class IE instrumentation. TVA's letter to NRC on June 7, 1989, reported that Phase I of the instrument project effectively established that SQN process instrumentation was adequate to resume plant operation. The June 7, 1989, letter also included TVA's proposal to close Phase II of the instrument project by implementing Engineering Requirements Specification ER-SQN-EEB-001. The revised CAP to CATD 223.03-SQN-01 parallels TVA's revised commitment for Phase II of the instrument project.