TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
SN 105B Lookout Place

December 27, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In the Matter of the)
Tennessee Valley Authority)

Docket Nos. 50-259
50-260
50-296
50-327
50-328
50-390
50-391
50-438
50-439

In response to the September 17, 1985 letter from W. J. Dircks to C. M. Dean, we provided Volumes I and II of TVA's Nuclear Performance Plan (NPP) to NRC on November 1, 1985 by letter from C. M. Dean to W. J. Dircks. As committed to in the November 1 letter, we submitted the Employee Concern Program to NRC by the November 20, 1985 letter from M. G. Parris to W. J. Dircks. This letter supplements our November 1 and November 20, 1985 responses to NRC's September 17, 1985 10 CFR 50.54(f) letter and provides information requested by Hugh Thompson's letters dated November 19 and December 6, 1985. Also please note that the November 20 submittal of our Employee Concern Program supersedes the information contained in the November 1 submittal in section 4.22 of Volume II of the Sequoyah NPP, regarding employee concerns.

Each employee concern received by QTC through the Special Employee Concern Program at Watts Bar is documented on an individual "K-form" and transmitted to NSRS. Before sending the K-form to NSRS, QTC makes a preliminary determination of the classification of each concern as safety related or not safety related and whether or not a concern potentially involves employee intimidation and harrassment (I&H) or misconduct. When a concern potentially involves I&H or misconduct, two separate "K-forms" are generated. One "K-form" documents the safety-related issue. A second "K-form" is used to

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document the I&M or misconduct aspect of the concern. This ensures that safety-related issues will be investigated independent of I&M or misconduct issues and the identification and investigation of safety-related issues is not tied to completion of I&M and/or misconduct investigations.

When NSRS receives "K-forms" from QTC, NSRS reviews QTC's preliminary classification of the concerns. Concerns that NSRS determine to be potentially safety-related are assigned for investigation to either QTC or NSRS. Also as "K-forms" are received by NSRS, copies of those that are potentially safety related are sent to the site director of the appropriate nuclear plant.

Watts Bar, Browns Ferry, and Bellefonte Nuclear Plants evaluate the "K-forms" they receive to determine whether or not the concern identified could be considered generic and applicable to Sequoyah (SQN). These plants also review NSRS/QTC safety-related investigation reports and the plant's responses to those investigation reports for generic applicability to SQN as they are received. Forms similar to enclosures 1, 2, and 3 define the criteria used to perform each of these reviews.

Sequoyah Nuclear Plant evaluates all potentially safety-related employee concerns that have been identified as specifically applicable to Sequoyah and those that were initially identified to be applicable to other TVA nuclear plants, but which have been determined to be potentially generic to Sequoyah. Each of these concerns is evaluated to determine which issues have to be addressed before restart of a Sequoyah unit. Attachment 4 to Sequoyah's Standard Practice SQA-166, (enclosure 4) provides the form used for the preliminary evaluation. This evaluation is performed at Sequoyah by SQN trained personnel who were shift technical advisors and are knowledgeable in plant technical specifications, safety limits, operability, attendant equipment, transient and accident analysis, and the margin of safety as defined in the technical specification bases. Enclosure 5 provides the guidelines used in the evaluation for determining safety significant employee concerns.

Over 1300 safety-related "K-forms" applicable to Sequoyah, Watts Bar, Browns Ferry, or Bellefonte have been reviewed and evaluated to date and additional "K-forms" are being evaluated as they are received. Enclosure 6 is a current listing of potentially safety-related employee concerns that were identified as specifically applicable to Sequoyah which we have determined must be

evaluated before restart of Sequoyah. The investigation of the NSRS/QTC concerns should be completed by January 17, 1986. Enclosure 7 is a current listing of potentially safety-related employee concerns that were identified as specifically applicable to Watts Bar, Browns Ferry, or Bellefonte but which we have determined could have generic implications for Sequoyah and which must be evaluated before restart of Sequoyah. These concerns have been grouped into one of six generic categories and then subdivided specific issues. A Management Review Group (MRG) with representatives from the Sequoyah plant staff and NSRS is responsible for determining which of these issues will require further investigation before Sequoyah restart. A task force has been established to investigate those issues that the MRG designates and will report the results to Sequoyah site management for disposition before restart.

For the safety-related generic employee concerns identified to date in enclosure 7, the evaluation will be performed in two stages. The first stage will involve identifying other efforts or studies that, if completed satisfactorily, will provide a satisfactory response for one or more of these generic concerns. The first stage should be completed by January 10, 1986. For the second stage, a detailed evaluation will have been scoped and begun before Sequoyah restart for those employee concerns which, if substantiated, could involve a technical specification or unreviewed safety question problem.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer

J. A. Domer, Chief
Nuclear Licensing Branch

Sworn to and subscribed before me
this 27th day of Dec. 1985

Paulette H. White

Notary Public

My Commission Expires 8-24-88

Enclosures

cc: See page 4

ENCLOSURE 1

-FORM D-

WATTS BAR SPECIAL PROGRAM ON EMPLOYEE CONCERNS
"K-FORM" REPORT REVIEW FOR GENERIC APPLICABILITY

_____
Employee Concern Number

I. **Preliminary Screening**

Does the "K-Form" provide sufficient information to perform a meaningful preliminary evaluation of the generic applicability?

YES _____ NO _____

If "no," no further evaluation is required until investigation information is available. Proceed to Section IV.

II. **Codes, Standards, Specifications, Procedures, and Processes Checklist**

A. An employee concern which states/implies that an approved code, standard, specification, procedure, process, etc., itself is deficient may have generic applicability to activities at the site for which the concern is identified, or may have generic applicability at other sites where the same code, standard, specification, procedure, or process is used. Complete the following:

- design criteria or specification — yes _____ no _____
- construction specification — yes _____ no _____
- construction process/procedure — yes _____ no _____
- material specification/qualification — yes _____ no _____
- maintenance, operation, or testing process/procedure — yes _____ no _____
- inspection process/procedure — yes _____ no _____
- other (specify) _____
  _____
  _____ — yes _____ no _____

If the answer to any of the above questions is "yes," the concern has potential generic implications and should be further evaluated.

B. An employee concern which states/implies that a code, standard, specification, procedure, process, etc., is not being properly implemented or followed may have generic applicability at the site for which the concern is identified, or may apply to other sites. Complete the following.

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Does the concern appear to be an isolated matter or does it appear to have generic implications?

isolated _____ generic _____

If generic, the concern should be further evaluated.

III. Other Evaluation Factors

The checklist above may not adequately cover the particular employee concern. The evaluator should note below any other factors important to the generic applicability evaluation.

_____

_____

_____

generic implications YES _____ NO _____

IV. Evaluators Determination

generic implications YES _____ NO _____

Plants potentially effected:

WBN _____
BLN _____
BFN _____
SQN _____

Evaluator notes indicating any clarifying comments, explanation of generic determination rationale, etc.

_____

_____

_____

Evaluator _____ Date _____
(Signature)

0071q

ENCLOSURE 2

FORM I

WATTS BAR SPECIAL PROGRAM ON EMPLOYEE CONCERNS
INVESTIGATION REPORT REVIEW FOR GENERIC APPLICABILITY

Employee Concern Number(s) _____ Investigation Report Number _____

I. **Codes, Standards, Specifications, Procedures, and Processes Checklist**

A. Employee concern investigation report findings which states that an approved code, standard, specification, procedure, process, etc., itself is deficient may have generic applicability to activities at the site for which the concern is identified, or may have generic applicability at other sites where the same code, standard, specification, procedure, or process is used. Complete the following:

- design criteria or specification — yes ____ no ____
- construction specification — yes ____ no ____
- construction process/procedure — yes ____ no ____
- material specification/qualification — yes ____ no ____
- maintenance, operation, or testing process/procedure — yes ____ no ____
- inspection process/procedure — yes ____ no ____
- other (specify) _____ — yes ____ no ____

If the answer to any of the above questions is "yes," the investigation report findings have potential generic implications and should be further evaluated.

B. Employee concern investigation report findings which states that a code, standard, specification, procedure, process, etc., is not being properly implemented or followed may have generic applicability at the site for which the concern is identified, or may apply to other sites. Complete the following.

Do the investigation report findings show that improper implementation is or has generic implications?

isolated _____ generic _____

If generic, the investigation report findings should be further evaluated.

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II. Other Evaluation Factors

The checklist above may not adequately cover the particular employee concern investigation report findings. The evaluator should note below any other factors important to the generic applicability evaluation.

_____

_____

_____

generic implications YES _____ NO _____

III. Evaluator's Determination

generic implications YES _____ NO _____

Plants potentially effected:

WBN _____
BLN _____
BFN _____
SQN _____

Evaluator notes indicating any clarifying comments, explanation of generic determination rational, etc.

_____

_____

_____

IV. "K-Form" Evaluation

When the "K-Form" was reviewed for potential generic implication, what was the evaluator's determination?

generic implications YES _____ NO _____

Determination by _____ Date _____
Signature

0071q

ENCLOSURE 3

FORM N

REVIEW FOR GENERIC APPLICABILITY OF RESPONSE

1. Was the condition/concern determined to have generic applicability at the "K-Form" or investigation report stage?

   "K-Form" stage? Yes ____ No ____

   Investigation report stage? Yes ____ No ____

2. If the answer to item 1 is "no" for both determinations, does the response include significant additional information which appears to make the condition generic?

   Yes ____ No ____

   If "yes," note plants:

   WBN ____
   BFN ____
   SQN ____
   BLN ____

3. Should generic applicability be further evaluated?

   Yes ____ No ____

4. Evaluator's Comments: _____

_____

_____

_____

_____

Evaluator _____ _____
Signature Date

ATTACHMENT 4
SEQUOYAH NUCLEAR PLANT
EMPLOYEE CONCERN PRELIMINARY EVALUATION

1. Concern No. _____

2. Is this concern potentially nuclear safety-related? _____
If no, state justification: _____

3. Concern classified as: _____ Determinant _____ Indeterminant
Justification for classification: _____

4. Determinant Employee Concern
a. Assuming concern is substantiated, what impact would it have: _____

b. Does any work need to be halted? _____

c. Does NSRS need to expedite evaluation? _____

d. Is there a technical specification problem? _____

e. Does it involve a potential USQ? _____

f. Does this concern need to be resolved before any particular plant milestone (if yes, list milestone)? _____

5. Indeterminant Employee Concern
a. If possible, describe what additional information is needed to perform a preliminary evaluation: _____

6. Additional Comments: _____

7. Completed by: _____ Date: _____

8. Approved by: _____ Date: _____

9. If 4b, c,d,e, or f is Yes, notify plant management: _____ / _____
Individual Notified Date

10. If 4d or e is Yes initiate generic evaluation. Applicable to: _____

ENCLOSURE 5
GUIDELINES FOR UNREVIEWED SAFETY QUESTION DETERMINATION

The following guidelines are utilized by personnel who have received the Shift Technical Advisor training to determine if a potential Unreviewed Safety Question exists.

Would the employee concern, if substantiated, adversely affect the following items:

a. Directly affects safety-related equipment:
   1. Function
   2. Performance
   3. Reliability
   4. Response Time
b. Indirectly affects safety-related equipment:
   1. Power Supply
   2. Air Supply
   3. Cooling or Lubrication or Ventilation
c. Affects primary containment integrity
d. Affects secondary containment integrity
e. Affects seismic analysis
f. Affects assumptions or values used in the FSAR
g. Affects single failure criteria
h. Affects separation criteria
i. Affects high energy line break
j. Affects control room habitability
k. Affects systems used to process radioactive wastes
l. Affects fire protection or fire loads
m. Affects security systems
n. Affects systems, procedures, or features described in the FSAR either in tests or drawings
o. Affects equipment qualification

If the concern could affect any of the above items, the concern is reviewed for (1) increasing the probability or consequences of an accident previously evaluated in Chapter 15 of the FSAR, (2) creating a new type of accident or malfuction, and (3) reducing the margin of safety defined in the basis of any technical specification. If any of the above three are yes--a potential Unreviewed Safety Question exists.

ENCLOSURE 6
EMPLOYEE CONCERNS SPECIFICALLY APPLICABLE
TO SEQUOYAH TO BE EVALUATED BEFORE RESTART

EMPLOYEE CONCERN NO.	SUBJECT
A. Welding	
XX-85-041-001 ✓	Improper Weld Tests
XX-85-049-001 ✓	Falsified Welder Certifications
XX-85-065-001 ✓	ISI Inspectors Remove Inspections Performed Poorly
XX-85-100-001 ✓	Improper Weld Repairs
XX-85-101-006 ✓	Welding Performed Without Certifications
XX-85-108-001 ✓	Welding Inspections in Unit 1 Acc. Rooms
XX-85-108-002 ✓	Welding Inspection Program Background
B. Configuration Control	
XX-85-070-001 ✓	Drawing and Document Errors
XX-85-070-005 ✓	Workplan Not Authorized by Office of Engineering
XX-85-077-002 ✓	Inaccurate Design Drawings Do Not Reflect As-Built Condition
C. Operational Readiness	
XX-85-033-006 ✓	Electrical General Foreman Used No-"C" Materials In A "C" System
XX-85-046-001 ✓	Instrument Sensing Line Slope Deficiencies
XX-85-068-007 ✓	TVA Manufactured Spool Piece Replaced A DRAVO-ASME Class Spool Piece
XX-85-069-001 ✓	Improper Certification Due to Lack of OJT
XX-85-087-001 ✓	Containment Coatings Unqualified
D. Supports/Anchors	
XX-85-010-001 ✓	Nuts Welded to Base Plates
XX-85-023-001 ✓	Pull Tests On Hangers/Anchors in the Annulus
XX-85-070-007 ✓	Snubbers Installed Not Per Design
E. Miscellaneous	
XX-85-001-001 ✓	Diesel Generator Batteries Replaced Without Initial Testing

ENCLOSURE 6
EMPLOYEE CONCERNS SPECIFICALLY APPLICABLE
TO SEQUOYAH TO BE EVALUATED BEFORE RESTART

EMPLOYEE CONCERN NO.	SUBJECT
B. Miscellaneous (continued)	
XX-85-027-X07	Sign Off Data Sheets on Defective Equipment or Face Insubordination Charges
XX-85-070-002	Quality Problems Intentionally Closed to Prevent Attracting NRC Attention
XX-85-070-006	Falsified Document Errors

NOTE: The below listed employee concerns, which were listed in our November 20, 1985 submittal, are related to the investigation of misconduct and not the safety-related aspect of the issue. They have, therefore, been deleted from the above history.

XX-85-049-X03	Welder Certification Card Falsified
XX-85-023-X02	Falsification of Anchor Pull Tests
XX-85-077-X04	Drawings have been Falsified

ENCLOSURE 7

EMPLOYEE CONCERNS WITH POTENTIAL GENERIC
APPLICABILITY TO SEQUOYAH TO BE EVALUATED BEFORE RESTART

A. Welding

1. Weld Rod Control

XX-85-068-006
WI-85-053-004

2. Inspection Criteria - Inspection through Paint

IN-85-458-001
WI-85-013-003
WI-85-041-008

3. Weld Inspection Tools Available

IN-85-406-003
IN-85-007-001
IN-85-134-002

4. Vendor Welds Inadequate

IN-85-007-003
IN-85-127-001

5. Inspection Criteria

IN-85-406-002

6. Welder/Inspector Training/Certification

WI-85-041-002
WI-85-041-006

7. Improper Welds on Hangers

IN-85-405-001
EX-85-039-003

8. Unpainted Welds

IN-85-273-001

B. Configuration Control

1. Relocation of Equipment

IN-85-463-007
IN-85-964-003

2. Vendor Manuals

IN-86-073-001

3. Installation of Equipment

IN-85-463-006

ENCLOSURE 7

EMPLOYEE CONCERNS WITH POTENTIAL GENERIC
APPLICABILITY TO SEQUOYAH TO BE EVALUATED BEFORE RESTART

C. Environmental Qualification

1. Instrument (Pressure) Transmitters Sent to Sequoyah From Watts Bar Without Adequate Documentation — IN-85-463-008

D. Operational Readiness

1. Operator Training/Qualification — IN-85-289-001, IN-85-894-001

2. QA Program Restricted, Violated, Or Hampered by Management — XX-85-102-010, IN-85-767-001, XX-85-069-009

3. Orifice Plates Causing Inaccurate Flow Measurements Due to Incorrect Hole Sizes — RS-85-004-001, IN-85-293-001, PM-85-022-001

4. Electrical Penetrations Inadequate — IN-85-346-002

5. Collusion Between Hartford Steam Boiler & TVA Causes Nonconforming Items — WI-85-053-001

6. Incorrect Instrument Sensing Lines Slopes Cause Incorrect Readings — IN-86-222-001, IN-85-197-001

7. Use of Jack Hammers to Compact Ice in Ice Condenser — IN-86-110-001

8. Power Block Restricting/Slowing Access to Equipment — IN-86-291-007

ENCLOSURE 7

EMPLOYEE CONCERNS WITH POTENTIAL GENERIC
APPLICABILITY TO SEQUOYAH TO BE EVALUATED BEFORE RESTART

E. Cables

1. Overfill of Cable Trays/Conduit

FM-85-003-023
IN-86-310-001
IN-85-506-001
IN-85-186-003
IN-85-432-001
IN-86-238-003
IN-85-622-001
IN-85-685-001
IN-86-028-002
IN-85-743-008

2. Overtensioning of Cables Due to Improper Cable Pull Methods

IN-85-255-001
IN-86-199-001
IN-85-213-001
IN-85-367-001
IN-86-259-004
IN-85-433-002
IN-85-856-005
IN-86-201-001
XX-85-094-005
IN-85-531-001
IN-95-325-005
IN-85-295-003
IN-85-112-001
XX-85-094-004
IN-86-259-001
IN-86-028-001
XX-85-008-001

F. Cable Tray and Conduit Hangers

1. Insufficient Support for Triax Cable From Neutron Flux Detectors — IN-85-120-001

2. Embedded Plates on Cable Tray Supports — IN-85-107-001

ENCLOSURE 7

EMPLOYEE CONCERNS WITH POTENTIAL GENERIC
APPLICABILITY TO SEQUOYAH TO BE EVALUATED BEFORE RESTART

C. Environmental Qualification

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3. Orifice Plates Causing Inaccurate Flow Measurements Due to Incorrect Hole Sizes	NS-85-004-001 IN-85-293-001 PH-85-022-001
4. Electrical Penetrations Inadequate	IN-85-346-002
5. Collusion Between Hartford Steam Boiler & TVA Causes Nonconforming Items	WI-85-053-001
6. Incorrect Instrument Sensing Lines Slopes Cause Incorrect Readings	IN-86-222-001 IN-85-197-001
7. Use of Jack Hammers to Compact Ice in Ice Condenser	IN-86-110-001
8. Power Block Restricting/Slowing Access to Equipment	IN-86-291-007