



TENNESSEE VALLEY AUTHORITY  
WATTS BAR NUCLEAR PLANT  
EMPLOYEE CONCERNS TASK GROUP  
OTHER SITES  
CEG

Element Title: Emergency/Abnormal Operating Instructions

SWEC Concerns: A02840926004-001, -002

Source Document: NRC Inspection Report 327, 328/84-02

Report Number: SWEC-SQN-02

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## I. INTRODUCTION

During an inspection at Sequoyah Nuclear Plant (SQN) February 7-10, 1984, the Nuclear Regulatory Commission (NRC) identified (reference A) one violation and one inspector follow-up item included in the Stone & Webster Engineering Corporation (SWEC) systematic analysis:

- A. AO2840926004-001, Emergency Level Classification Procedure Not Referenced; and
- B. AO2840926004-002, Untimely Transmittal of Emergency Plan Changes to NRC.

Information on the background, the corrective actions taken, the verification methodology and analysis, the completion status, and any pertinent references for these items is included in this report.

## II. OVERVIEW OF SWEC ITEMS

### A. AO2840926004-001, Emergency Level Classification

#### 1. Background

The NRC inspector determined that Emergency Operating Instructions (EOIs) and Abnormal Operating Instructions (AOIs) did not always reference the Implementing Procedure, IP-1, "Emergency Plan Classification Logic" of the Sequoyah Radiological Emergency Plan when the subject incident was classifiable. Followup of this discrepancy was to be under IFI 84-02-01.

#### 2. Corrective Actions Taken

SQN reviewed the EOIs and AOIs, and added the IP-1 reference where needed.

#### 3. Verification Methodology

The SWEC concerns identified for Employee Concerns Task Group (ECTG) verification was stated as follows:

<u>RIMS #</u>	<u>Issue</u>	<u>RIMS Item</u>
AO2 840926 004	Emergency Operating Instructions and Abnormal Operating Instructions did not always reference the Classification Procedure when the incident was classifiable.	RIMS-001

ECTG reviewed the applicable procedure and the Sequoyah Compliance Licensing files for internal and external correspondence related to this issue. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis

The ECTG review of the pertinent documentation indicated that the NRC item was adequately resolved. The NRC found the current EOIs and AOIs to be acceptable and closed the IFI in report 327, 328/84-22 and 84-23, dated September 24, 1984.

5. Completion Status

Based on the SQN corrective actions, compliance with requirements, and NRC closure of the item, no further action on this item is required. This item is closed.

B. A02840926004-002, Untimely Transmittal of Emergency Plan Changes to NRC

1. Background

The NRC inspector noted (reference A) one violation (327, 328/84-02-02) in that changes to the NUC PR Central Emergency Control Center and Muscle Shoals Emergency Center implementing procedures were not always submitted to the NRC within 30 days of the changes as required.

2. Corrective Actions Taken

In their response to the NRC (reference B), TVA attributed the late transmittals to an attempt to send the changes to the NRC in a batch. TVA stated that future changes will be transmitted to the NRC as they occur.

3. Verification Methodology

The SWEC concerns identified for ECTG verification was stated as follows:

<u>RIMS #</u>	<u>Issue</u>	<u>RIMS Item</u>
A02 840926 004	Emergency Plan Implementing Procedure Changes Trans to NRC more than 30 days after date of such changes.	RIMS-002

ECTG reviewed the Sequoyah Compliance Licensing files for internal and external correspondence related to this issue. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis

The ECTG review of the pertinent documentation indicated that the NRC item was adequately resolved. The NRC inspector verified that the six changes to TVA emergency plan procedures following the violation were submitted to the NRC within 30 days after the change. The NRC found the SQN response to be acceptable and closed the violation in Report 327/84-22 and 328/84-23, dated September 24, 1984 (reference C).

5. Completion Status

Based on the SQN corrective actions, compliance with requirements, and NRC closure of the item, no further action on this item is required. This item is closed.

III. REFERENCES

- A. NRC Inspection Report Numbers 50-327/84-02 and 50-328/84-02, dated March 5, 1984, from D. M. Verrelli to H. G. Parris.
- B. TVA Letter, "Sequoyah Nuclear Plant Units 1 and 2 - NRC-OIE Region II Inspection Report 50-327/84-02 and 50-328/84-02 - Response to Violations," dated March 30, 1984.
- C. NRC Report Numbers 50-327/84-22 and 50-328/84-23, dated September 24, 1984, from D. M. Verrelli to H. G. Parris.