

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

6N 38A Lookout Place

OCT 20 1989

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

Gentlemen:

In the Matter of )  
Tennessee Valley Authority )

Docket Nos. 50-327  
50-328

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2 - INSPECTION REPORT (IR)  
NOS. 50-327, 328/88-09 - REQUEST FOR ADDITIONAL INFORMATION CONCERNING TVA'S  
DENIAL OF NOTICE OF VIOLATION 88-09-02

This letter responds to a verbal request by G. A. Belisle, NRC, to supply additional information concerning TVA's handling of in-process Quality Assurance documentation as it relates to TVA's denial of Violation 88-09-02 dated July 1, 1988. Enclosed is TVA's response to questions raised during the telephone conversation on August 9, 1989, between NRC and TVA.

If you have any questions concerning this submittal, please telephone M. A. Cooper at (615) 843-6651.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*Mark O. Medford*

Mark O. Medford, Vice President  
and Nuclear Technical Director

Enclosure  
cc (Enclosure):

Ms. S. C. Black, Assistant Director  
for Projects  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

Mr. B. A. Wilson, Assistant Director  
for Inspection Programs  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

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

An Equal Opportunity Employer

8910250267 891020  
PDR ADDCK 05000327  
PDR

TEO  
11/1

ENCLOSURE 1  
RESPONSE TO NRC'S VERBAL REQUEST FOR ADDITIONAL  
INFORMATION REGARDING VIOLATION RESPONSE 89-09-02  
IN-PROCESS QUALITY ASSURANCE (QA) DOCUMENTATION

- References:
1. K. P. Barr's letter to TVA dated May 17, 1988, "Notice of Violation (NRC Inspection Report Nos. 50-327/88-09 and 50-328/88-09)"
  2. TVA letter to NRC dated July 1, 1988, "Sequoyah Nuclear Plant (SQN) Units 1 and 2 - NRC Inspection Report Nos. 50-327/88-09 and 50-328/88-09 - Response to Notice of Violations Nos. 50-327, 50-328/88-09-01 and -02"
  3. Telephone conversations on July 26, 1989, and August 9, 1989, between G. A. Belisle (NRC) and TVA

In the initial response (Reference 2) to the subject notice of violation (NOV) (Reference 1), TVA denied the violation based on the fact that the documents in question were QA documents, not QA records. Several references were listed that supported this position. However, TVA recognized that it was to TVA's advantage to afford certain documents, which were destined to become QA records, a degree of protection in handling and storage because of the difficulty of reconstructing and/or replacing them. TVA considered this action to be an enhancement to the records program. Accordingly, SQN revised Administrative Instruction (AI) 7, "Controlling and Processing Records," to include a section for in-process QA records. A revision to the Nuclear Quality Assurance Manual (NQAM), Part III, Section 4.1 (incorporated in Nuclear Power Standard [NPSTD] 5.9.80), included a section on storage for in-process QA records. TVA surveyed the list of documents that are designated to become QA records when completed. The only documents that TVA believes should receive additional or special handling and storage treatment because of difficulty of replacing or recreating are workplans (WPs), work requests, and surveillance instruction (SIs). The aforementioned procedures effectively control the handling and storage of these documents. The effective implementation of these procedures will correct and prevent recurrence of problems such as outlined by the alleged violation.

During the exchange of facts and philosophy in the two telephone conversations (Reference 3), the following three concerns were expressed by Mr. Belisle and are responded to by TVA as follows:

1. This issue has repeatedly been reviewed, and each time attention has been narrowly focused on a new type document, i.e., procurement documents, preoperational test documents, SIs, and now WPs.

L. E. Martin, TVA, responded to this concern by stating that, as previously reported in the original response, TVA has identified the documents that need special handling and storage. However, an additional and formal request would be made to the appropriate organizations to identify those in-process QA documents in their cognizance that needed special considerations. This would provide additional assurance that in-process QA documents would be handled consistently TVA-wide. The response to Mr. Martin's request only identified five additional documents, all relating to operator training records.

2. NRC is concerned with TVA's inconsistency in handling in-process QA documents from one organization to another.

At present, controls for in-process QA documentation are contained in NPSTD 5.9.80. At SQN, in-process QA documents, other than those described in AI-7, will be handled "at risk," i.e., no special protection. To evaluate consistency, SQN Site QA monitors activities and conducts surveys of the implementation of these upper-tier procedural requirements. Inconsistencies and deviations to procedures controlling in-process QA documentation will be identified and appropriately dispositioned utilizing TVA's corrective action program.

3. NRC is concerned with TVA's failure to take prompt corrective action in addressing the problem when it was first identified in Corrective Action Report (CAR) CAR-86-04-024.

CAR-86-04-024 was initiated on May 12, 1986; however, in-process QA documents were not included in the original scope of the concern or corrective action. On December 22, 1986, the scope was expanded to include in-process QA documents. In the corrective action of the CAR, it was discovered that two storage areas were identified as being unacceptable because of transient fire loading surveys. On September 29, 1988, fire surveys were completed; the two areas previously mentioned had been corrected. On October 21, 1988, the corrective action for CAR-86-04-024 was verified as complete and acceptable; the CAR was closed. Given the magnitude and complexity of the work involved to correct the problem and the efforts extended toward plant restart, SQN does not consider that an inordinate amount of time was spent to identify deficiencies, expand the scope, train personnel, transfer and/or rearrange areas and equipment, and verify that all the actions described in the CAR were complete.

In summary, SQN has surveyed the appropriate organizations and identified those documents that should be afforded special handling and storage protection commensurate with the difficulty to reproduce, recreate, or retrieve the data or information. SQN is now implementing requirements for handling in-process QA documentation in AI-7. All other documents destined to become QA records will be handled on an at-risk basis.