

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

March 20, 1981

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNIT 2 - NRC-OIE REGION II - INSPECTION REPORT -
50-328/81-03

The subject letter dated February 20, 1981, cited TVA with one Severity
Level V violation. Enclosed is our response to that violation.

An extension to the submittal schedule for this response was discussed with
D. Quick on March 17, 1981.

If you have any questions, please get in touch with D. L. Lambert at
FTS 857-2581.

To the best of my knowledge, I declare the statements contained herein are
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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SEQUOYAH NUCLEAR PLANT UNIT 2
OIE INSPECTION REPORT 50-328/81-03
RESPONSE TO SEVERITY LEVEL VI VIOLATION 328/81-03-02
SCAFFOLD PLACED ON 1-1/2-INCH STAINLESS STEEL PIPE

Description of Violation

10 CFR 50, Appendix B, Criterion V, as implemented by the FSAR, paragraph 17.1A.5, requires that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. SNP-CP NO. P-12 does not allow scaffolding to be placed on pipe sizes less than 3-inch diameter, nor does it allow metal scaffolding to be placed on stainless steel pipe of any size without a pad between the pipe and the metal scaffold.

Contrary to the above, a metal scaffold was placed on a 1-1/2-inch diameter safety stainless steel pipe.

Admission or Denial of Alleged Violation

The scaffold being placed on the 1-1/2-inch stainless steel pipe, as described in the subject violation, occurred as stated; however, construction procedure SNP-CP NO. P-12 was not violated because this procedure is not applicable to the group responsible for the placement of the scaffold. SNP-CP NO. P-12 is a Division of Construction procedure and was written assuming that much of the scaffolding being utilized could be in place for years at a time with extremely heavy use. The Division of Nuclear Power Outage Group was responsible for the placement of the scaffold.

Division Procedure Manual (DPM) N78S2-M16 and Hazard Control Instruction (HCI) - M2 are the governing procedures for the outage group for scaffold installation and use. No violation of these procedures took place with the placement of the subject scaffolding.

Reason for Violation

See above.

Corrective Action Taken and Results Achieved

The aluminum scaffold has been removed from the pipe. The pipe was inspected and no damage was observed.

Steps Taken to Avoid Further Recurrence

TVA is evaluating the existing procedures to ensure adequate measures are being taken in the placement of scaffolding.

Date of Full Compliance

TVA will complete this review by June 1, 1981, and make and implement any necessary change by September 1, 1981.