

400 Chestnut Street Tower II

May 11, 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 UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/81-12, 50-328/81-09 - REVISED RESPONSE TO VIOLATION

The subject inspection report dated March 27, 1981, cited TVA with one Severity Level IV Violation in accordance with 10 CFR 2.201. A response to the violation was submitted on April 17, 1981. Enclosed is our revised response as requested by D. Quick.

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, 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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ENCLOSURE  
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2  
REVISED RESPONSE TO VIOLATION 50-327/81-12-01

Violation 50-327/81-12-01

Technical Specification 3.6.1.1 requires that containment integrity shall be maintained in modes 1, 2, 3, and 4 and that containment penetration isolation be verified periodically. Containment integrity is based in part on 10 CFR 50, Appendix A, Criterion 56, which requires that lines that penetrate containment and are open to the containment atmosphere be isolated by one locked closed valve inside and one locked closed valve outside containment.

Contrary to the above, containment integrity has not been adequately maintained or verified in that, position requirements for the inside containment isolation valve for the service air system, valve 1-33-704, was not included in system operating instruction SOI-88.1, Containment Isolation Integrity. Valve 1-33-704 was normally maintained in the open position; however, the outside containment isolation valve, 1-33-740, was maintained closed and periodically verified to be in the proper position during unit operation.

This is a Severity Level IV Violation (Supplement I.D.3.).

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation if Admitted

The original design and construction was that valve 1-33-704 was a check valve. The valve was subsequently replaced with a manually operated valve which should have been normally closed. When this modification was made, drawing 47W846-2 was marked up indicating this change and submitted to drawing control. This was the correct procedure for having the drawing revised to include the modification; however, drawing control incorrectly revised the drawing to show a normally open valve. When the valve lists in SOI-88.1 and SI-14 were made, this valve was therefore omitted.

Corrective Steps Which Have Been Taken and Results Achieved

Upon the discovery that valve 1-33-704 had been incorrectly identified as a normally open manually operated valve, a temporary alteration control form was issued to ensure that this valve was closed and containment integrity maintained.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Drawing 47W846-2 is being changed to show valve 1-33-704 as a normally closed manually operated valve. Operating instruction SOI-88.1 and surveillance instruction SI-14 are being revised to include valve 1-33-704. Additionally, a drawing review was performed, and comparisons to the valves listed in SOI-88.1 and SI-14 were made. This was done to confirm that there were no other valves incorrectly identified on the drawings and that there were no additional valves incorrectly positioned.

Date When Full Compliance Will Be Achieved

We are now in full compliance.