

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower I.

March 16, 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 1 - NRC-OIE REGION II INSPECTION REPORT
50-327/81-02 - RESPONSE TO VIOLATION

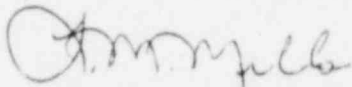
The subject inspection report dated February 18, 1981, cited TVA with one
Severity Level V Violation. Enclosed is our response.

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
RESPONSE TO VIOLATION

Violation 50-327/81-02-1

Technical Specification 6.5.1.7(b) requires that the PORC shall render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) constitutes an unreviewed safety question.

Contrary to the above, the PORC has not rendered determinations in writing with regard to whether or not procedures or changes thereto considered under 6.5.1.6(a) constitutes an unreviewed safety question.

Admission or Denial of the Alleged Violation

TVA believes the violation is based on misinterpretation of the requirements. The minutes of PORC meetings state, "PORC reviewed and recommended approval...." SQA21 contains the statement, "In its review of proposed changes to plant instructions, changes to equipment, changes to routine tests, and the review of proposed special tests, the committee shall consider the following: ...5. Determination if an unreviewed safety question is involved. If so, a written summary shall be submitted to the Nuclear Safety Review Board and the Assistant Director of Nuclear Power (Operations) for review." Sequoyah considers this combination to be a determination in writing with regard to whether or not procedures or changes thereto considered under 6.5.1.6(a) constitutes an unreviewed safety question.

Reason for the Violation

Not applicable

Corrective Steps Which Have Been Taken and the Results Achieved

Not applicable

Corrective Steps Which Will Be Taken to Avoid Further Violations

To avoid future interpretation problems, Sequoyah immediately began adding the following statement to the PORC minutes. "PORC reviewed the items listed below and determined that each item does not constitute an unreviewed safety question." In addition, a Standard Practice has been drafted to further define the performance of an unreviewed safety question determination.

Date When Full Compliance Will Be Achieved

Sequoyah is now in full compliance with the NRC's interpretation of the requirement.