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AUG 09 1982

Tennessee Valley Authority
ATTN: Mr. H. G. Parris
Manager of Power
500A Chestnut Street Tower II
Chattanooga, TN 37401

Gentlemen:

Subject: Report Nos. 50-327/82-05 and 50-328/82-05

This is response to your letters dated June 1 and 25, 1982 in which you discussed certain violations brought to your attention in the Notice of Violation with our letter of April 20, 1982.

Your actions to correct Violation A and to prevent its recurrence will be examined during future inspections of your program.

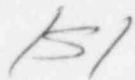
Your denials of Violations B and C have been evaluated by our staff as shown in the enclosure to this letter. For the reasons presented in the enclosure, we have concluded that Violation B should be withdrawn and designated an unresolved item pending further NRC inspection. However, we have also concluded that Violation C is valid as stated in the Notice of Violation enclosed with our letter of April 20, 1982. Therefore, as required by 10 CFR 2.201, please submit to this office, within twenty days of the date of this letter, a written response including corrective steps which have been taken for Violation C, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved.

In accordance with 10 CFR 2.790(a), a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,



Richard C. Lewis, Director
Division of Project and
Resident Programs

Enclosure:
(See Page 2)

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Enclosure: Evaluation
of Licensee Response

cc w/encl:

H. J. Green, Director of
Nuclear Power
G. G. Stack, Project Manager
C. C. Mason, Plant Superintendent
J. F. Cox, Supervisor, Nuclear
Licensing Section
M. J. Burzynski, Project Engineer
H. N. Culver, Chief, Nuclear
Safety Review Staff

bcc w/o encl:

NRC Resident Inspector
Document Management Branch
State of Tennessee

RII *ER*
CEA/derson:cmc
8/6/82

Skinner

CMU
RII
CMUpright
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RII
R. Lewis
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Enclosure

Evaluation of Licensee Response

1. The licensee denied Item B of the Notice of Violation which stated that retraining had never been conducted and provided evidence to support the contention that such training had been conducted. In retrospect, Region II believes that the citation was not clearly articulated and thus implied a scope beyond what was intended. Specifically, the violation related to substantive changes which had been made in the quality assurance program through Revision 4 to the approved program (TVA-TR75-1A) which affect the following General Employee Training (GET) segments:
 - a. The course objective of GET 4 is to familiarize personnel with the purpose and meaning of QA/QC, the TVA organizations having QA/QC responsibility, and the objectives and methods of implementing the total QA program. Revision 4 to TVA-TR75-1A modified existing responsibilities and added new responsibilities for program implementation.
 - b. The course objective of GET 5.1 is to familiarize personnel with requirements for preparation, review, approval, distribution, and revision of plant documents. Revision 4 modified various responsibilities and controls regarding procedures, instructions, and drawings.
 - c. The objective of GET 14.1 is to familiarize personnel with the procurement of materials, components, and spare parts and with preparation of purchase requests. Revision 4 modified responsibilities for the determination of type and extent of supplier evaluations, for inspection and surveillance at vendor facilities, and for receipt inspections.

It should also be noted that procedure AI-14 which implements Section 17.2.2 of the approved QA program requires the assistant plant manager to evaluate the GET program annually and recommend any required retraining. The documents provided by the licensee in their response indicates that the most recent evaluation of the GET program performed by the Assistant Plant Manager was conducted in November 1980 and that evaluation did not appear to address retraining.

Notwithstanding the above, and in view of both the ambiguity of the violation and the information submitted by the licensee regarding other segments of the GET retraining program, we conclude that the violation should be withdrawn and designated an unresolved item pending further NRC inspection in this area.

Enclosure

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2. The licensee denied Item C of the Notice of Violation stating that they believed their program which includes training of engineers and general foremen in the QA requirements and the instruction of temporary employees to always follow appropriate procedures when performing quality-related work ensures compliance with the intent of 10 CFR 50, Appendix B, Criterion II.

The licensee further stated that temporary craftsmen are trained to follow procedures and the quality-related work they do is performed in accordance with written approved procedures or instructions containing appropriate quality control holdpoints for inspection. Finally, the licensee stated that the cognizant engineer reviews the completed work to ensure that all required inspections and holdpoints have been observed and completed.

With regard to the assertion that temporary employees work under the supervision of engineers and general foremen who have been trained in QA requirements, it should be noted that the inspection disclosed that two of six outage foremen and nine engineers and supervisors in the outage group had received some, but not all, of the training specified in administrative instruction AI-14.

The licensee has established an excellent training program for permanent craftsmen at the Sequoyah site to ensure their knowledge of the administrative, quality, and safety aspects of their assigned position. In that outage craftsmen perform essentially the same function as permanently assigned craftsmen, it is appropriate and necessary that they receive the same training. The latest industry standard on this subject, ANS 3.1-1981 supports the position that temporary employees must be trained in all areas where their activities could affect the quality of an operating nuclear power plant. Moreover, Procedure N79A7, Nuclear Plant General Employee Training Program, in the Division of Nuclear Power Procedures Manual specifically includes temporary and field services personnel in the training program.

Finally, the licensee's contention that outage craftsmen are instructed to follow procedures which contain appropriate instructions and holdpoints for inspection and that their work is inspected and reviewed, is not persuasive. The same is true of permanently assigned craftsmen and the licensee has not argued, nor would the NRC accept, that such limited training would satisfy the intent of Criterion II of 10 CFR 50 Appendix B. Likewise, the NRC does not accept the premise that quality can be inspected or audited into the work; the primary responsibility for quality must be placed on the individual performing the activity affecting quality and that individual must be trained to carry out that responsibility.

Therefore, we conclude that the violation is valid as written in the Notice of Violation.