

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

830 Power Building

November 14, 1978

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 LETTER RII:WPA 50-327/78-25
AND 50-328/78-18 - INFRACTION 328/78-18-02 - REVISED RESPONSE

The subject letter dated October 2, 1978, cited TVA with one infraction,
and our response was transmitted to your office on October 25, 1978.
Enclosed is a revised response providing additional information as
requested by Inspector William Ang.

If you have any questions concerning this matter, please get in touch with
M. K. Wisenburg at FTS 854-2581.

Very truly yours,

J. E. Gilleland
J. E. Gilleland
Assistant Manager of Power

Enclosure

cc: Mr. John G. Davis, Acting Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2
INSPECTION REPORT 327/78-25 AND 328/78-18
INFRACTION 328/78-18-02

REVISED FINAL REPORT

Infraction 328/78-18-02

10 CFR Part 50, Appendix B, Criterion V, as implemented by PSAR Section 17.1A.5, states in part that "Activities affecting quality shall be prescribed by documented instructions, procedures, drawings, . . . and shall be accomplished in accordance with these instructions, procedures or drawings."

- a. SNP Inspection Instruction No. 38, paragraph 7.0.B, requires in part that "During the inspection, the inspector shall properly identify or verify proper assembly unique identifier for each assembly either by tag or stencil or by records and drawings traceable to the assembly."
- b. SNP Inspection Instruction No. 38, paragraph 7.0.A, requires in part that inspectors "Inspect the assembly to verify conformance to drawings, specifications. . ."
- c. SNP Construction Procedure No. P-12, paragraph 6.0.A.5, requires in part that "Items shall be protected from excessive accumulation of dirt and debris."

Contrary to the above:

- a. Support No. 2-RHRH-463 had been satisfactorily inspected in accordance with SNP II-38. The label plate of the mechanical snubber of Support No. 2-RHRH-463 had the correct support number stamped but also had Support No. 2-RHRH-469 vibrotool marked directly above the correct support number.
- b. Support Nos. 2-RHRH-428 and 2-RHRH-430 had been satisfactorily inspected in accordance with SNP II-38. The grease fittings for these supports had been painted and paint was visible on the internal surfaces of the grease fittings. The detailed drawings for these supports neither showed the grease fittings nor required fittings to be painted.
- c. The internals of the spring cans for Support No. 2-UHHH-6 was found to contain excessive amounts of sand blasting particles, a beverage can tab and cigarette butts.

Corrective Steps which have been Taken and the Results Achieved:

- A. Investigation of the snubber with two numbers marked on it revealed that the correct type of snubber had been installed, and that the support assembly had been correctly identified on the inspection records in accordance with SNP Construction Procedure No. P-24, "Inspection and Test Status." This procedure provides for identifying supports by their location as shown on drawings. Unique marking of supports, or of snubbers, is not required.

At the beginning of the snubber installation program, an attempt was made to assign a unique identification number to each snubber. This attempt was found to be excessively burdensome and costly because it was necessary to remove some snubbers for repair, confusing the numbers and causing errors in the record keeping. It was therefore decided to ignore the unique identification numbers and to identify the snubbers by location as defined by records and drawings, as is also permitted by the construction procedures. It is therefore irrelevant whether various snubbers have correct, extraneous, or no identification numbers on the individual snubbers or hangers.

- B. The visible paint on the grease fittings of support 2-RHRH-428 and 2-RHRH-430 has been removed. Proper lubrication of the supports has been performed and documented in accordance with SNP Inspection Instruction No. 50, "Equipment Lubricant Inspection." The grease fittings are not shown on the hanger-snubber assembly drawing used in the inspection. That drawing has bill of material which refers to manufacturers' catalogs which have details of grease fittings. Fittings which will not take grease are replaced.
- C. The sandblasting particles, beverage can tab, and cigarette butts have been removed from the spring can on support 2-UH1H-6. Construction personnel have been instructed to not place debris in open safety-related equipment.

Corrective Steps which shall be Taken to Avoid Further Non-compliance:

- A. To provide greater assurance that the correct type of snubbers are installed in supports, SNP Inspection Instruction No. 38, "Inspection of Site Fabricated Assemblies," is being revised to specify inspections for the correct type and size of snubber.
- B. SNP Inspection Instruction No. 50 is being revised to ensure that grease fittings are free of paint and other forms of contamination before the application of lubricants. Additionally, craft personnel have been instructed to exercise the necessary precautions to prevent paint from being applied over grease fittings.

- C. SNF Inspection Instruction No. 29, "Inspection of Variable Springs," is being revised to ensure that all spring cans are free of debris before spring can assemblies are signed off.

Dates when Full Compliance will be Achieved:

- A. We will be in full compliance on December 17, 1978.
- B. We will be in full compliance on December 17, 1978.
- C. We will be in full compliance on December 17, 1978.