TENNESSEE VALLEY AUTHORITY

CHATTANOOGA. TENNESSEE 37401 830 Power Building

November 9, 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 INSPECTION REPORT 50-327/78-14 AND 50-328/78-10 - REVISED RESPONSE TO INFRACTION

This is in response to C. E. Murphy's letter dated October 2, 1978, requesting information in addition to that presented in our July 21, 1978, response to this infraction. Enclosed is our revised response to this infraction.

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

Very truly yours,

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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ENCLOSURE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 NRC-OIE INSPECTION REPORT 327/78-14 AND 328/78-10 RESPONSE TO INFRACTION

Infraction--327/78-14-01, 328/78-14-01

10 CFR Part 50, Appendix B, Criterion XVI, as implemented by PSAR Section 17.1A.16, states in part that, "measures shall be established to assure that conditions adverse to quality are promptly identified and corrected." SNP Construction Procedures P-2 and DEC-QAP 16.02 specify the corrective action required to prevent recurrence.

Contrary to the above, the licensee's corrective actions have not been effective in preventing recurrence in the following areas.

- Small diameter pipe (instrument tubing) was found distorted and not properly protected.
- 2. Welder's cables were found in contact with the reactor coolant pipe.

Corrective Steps Which Have Been Taken and Results Achieved

 To physically protect small diameter piping and instrument sensing lines:

Craft employees have been instructed to take appropriate measures to protect all permanent equipment (including small diameter piping and instrument sensing lines) while work is in progress. Routine storage and maintenance surveillance will be performed in accordance with SNP Construction Procedures P-6 and P-12 and documented in accordance with SNP Inspection Instruction No. 32 to confirm compliance with these requirements.

 To protect permanent equipment and stainless steel piping from arc damage due to electrical cables:

A complete survey of the powerhouse area has been made and all cable removed from close proximity to stainless steel piping and other permanent equipment where electrical arc damage might occur.

Corrective Steps Which Shall Be Taken to Avoid Further Noncompliance

 To physically protect small diameter piping and instrument sensing lines: Two crafts people have been assigned full-time responsibility for surveillance of small diameter piping, including instrument sensing lines, in the area of the powerhouse. These two people are assigned to locate and correct damaged and open piping in the powerhouse area.

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specific inspections are performed by the inspection units every two weeks to detect and report any violations or borderline cases. These are reported and controlled in accordance with Construction Procedure P-6 and Inspection Instruction II-32. Damages found by this surveillance on features that have been accepted by previous inspections are treated as nonconforming items in accordance with Construction Procedure P-2.

System engineers have been reinstructed in the importance of damage to installed features. Any conditions discovered by these engineers in the performance of their duties are immediately repaired, replaced, or designated nonconforming in accordance with appropriate construction procedures.

 To protect permanent equipment and stainless steel piping are damage due to electrical cables:

Three crafts people have been assigned the full-time responsibility for surveillance and corrections of conditions that might result in electrical arc damage to permanent equipment and stainless steel piping.

Inspection of electrical cables that might cause arc damage has been added to the surveillance inspection report submitted by welding inspectors during each shift, when welding is performed. Corrective action is initiated immediately upon discovery.

Additionally, all craft foremen have been instructed that electrical cords are not to come in contact with stainless piping and safetyrelated equipment and to take the necessary immediate action to remove all electrical cords that are in contact with stainless piping and/or safety-related equipment within their work area. Each foreman has been informed that he will be held personally responsible for any violations by employees under his supervision. The electrical department will submit a daily report to the Assistant Construction Superintendents.

All cases where personnel have allowed electrical cords of any type to remain in contact with stainless piping or safety-related equipment will be dealt with on an individual basis with the necessary support and enforcement of upper management.

To determine the effectiveness of the above action, QC inspection personnel shall perform a weekly inspection and submit a report for the evaluation of the Construction Engineer and Superintendent. Date When Full Compliance Will Be Achieved

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1. We are now in full compliance.

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2. We are now in full compliance.