

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

August 30, 1982

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC/OIE REGION II INSPECTION REPORT
50-237/82-05 AND 50-328/82-05 - REVISED RESPONSE TO VIOLATION

The subject inspection report dated August 9, 1982 from R. C. Lewis to H. G. Parris indicates that Severity Level V Violation C is valid as stated in the Notice of Violation enclosed with F. J. Long's letter to H. G. Parris dated April 20, 1982. Enclosed is our revised response to item C of the subject inspection report.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

D S Kammer

D. S. Kammer
Nuclear Engineer

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE

RESPONSE - NRC INSPECTION REPORT
NOS. 50-327/82-05 and 50-328/82-05
R. C. LEWIS'S LETTER TO H. G. PARRIS
DATED AUGUST 9, 1982

Item C (50-327/82-05-03 and 50-328/82-05-03)

10 CFR 50, Appendix B, Criterion II and the Accepted QA Program (TVA-TR75-1, Revision 4), Section 17.2.2 requires a training program to provide for indoctrination of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. The OQAM, Part III, Section 6.1, paragraph 6.1 states that all persons regularly employed in the nuclear power plant shall be trained in the area of Plant Quality Assurance Program.

Contrary to the above, the training requirements for an outage craftsman specified in AI-14, Plant Training Program, Revision 11, does not require training in the Quality Assurance Program.

This is a Severity Level V Violation (Supplement I).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Because the outage craftsmen (Field Services craftsmen) are temporary employees and the quality related work performed by these craftsmen is performed in accordance with written, approved procedures and instructions, TVA felt that these employees should not receive all the training specified for permanent employees and that our program was meeting the intent of 10 CFR 50, Appendix B, Criterion II.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Action has been taken to initiate a program to schedule temporary employees for training in the quality assurance area.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Scheduling efforts will continue in order to train the temporary and permanent employees in the required General Employee Training (GET) areas within the designated 6-month time interval from their initial employment. Administrative Instruction (AI) 14 will be revised accordingly. It should be noted that all temporary employees

who perform activities affecting quality will be under the supervision of a quality assurance trained individual at least until their quality assurance training completion.

5. Date When Full Compliance Will Be Achieved

Action was taken to implement the revised GET program for temporary employees on August 20, 1982. It is anticipated that within six months this program will enable us to maintain a level of completion approaching 100 percent. Full compliance will be achieved by February 20, 1983 when the program will be fully implemented and procedure changes issued.