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**DEC 27 1990**

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

In the Matter of ) Docket Nos. 50-327  
Tennessee Valley Authority ) 50-328

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - NRC INSPECTION REPORT  
NOS. 50-327, 328/90-34 - RESPONSE TO NOTICE OF VIOLATION (NOV) 90-34-01

Enclosed is TVA's response to Bruce A. Wilson's letter to O. D. Kingsley, Jr., dated November 16, 1990, which transmitted the subject NOV. In a telecon with Joe Brady of your office on December 17, 1990, the due date of this response was extended to January 4, 1991.

Enclosure 1 provides TVA's response to the NOV. Enclosure 2 contains the summary statements of commitments contained in this submittal.

If you have any questions concerning this submittal, please telephone M. A. Cooper at (615) 843-6422.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark O. Medford

Enclosure  
cc: See page 2

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U.S. Nuclear Regulatory Commission

DEC 27 1990

cc (Enclosure):

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ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-327/90-34 AND 50-328/90-34  
B. A. WILSON'S LETTER TO O. D. KINGSLEY, JR.,  
DATED NOVEMBER 16, 1990

Violation 50-327-38/90-34-01

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained covering Fire Protection Program implementation.

Physical Security Instruction (PHYSI) 13, Revision 55, "Fire," Attachments E and H, detail the controls imposed on transient fire loads in safety-related areas. The procedure requires, in part, that equipment shipped in untreated combustible containers may be unpacked in safety-related areas only if the containers are immediately removed following unpacking process.

Contrary to the above, for the period of October 1 through October 11, 1990, a large amount of non-fire-rated wood was left unattended in the auxiliary building on Elevation 669'.

This is a Severity Level IV violation (Supplement I).

Admission or Denial of the Alleged Violation

TVA admits the violation.

Reason for the Violation

The non-fire-rated wood of the subject violation was a shipping crate for a replacement residual heat removal pump motor. The Electrical Maintenance (EM) personnel responsible for the motor were informed by Radiological Control that the motor could not be uncrated in the turbine building because it was contaminated. The EM foreman contacted Fire Operations to request a transient fire load (TFL) permit. Fire Operations informed him that because the wood was untreated (i.e., not fire retardant), he could not obtain a permit. Fire Operations did not suggest any alternatives. The EM personnel, a general foreman and a foreman, chose to violate the known fire protection requirements rather than escalating the conflict to management in order to complete their work in a timely manner. The crate was not removed from the auxiliary building immediately following unpacking, as maintenance personnel intended to use it to remove the replaced motor after the work was completed. Problems with the pump and a larger than expected workscope delayed the motor replacement, and hence, the crate removal. The responsible EM personnel were notified on two occasions by Fire Operations and Work Control to remove the crate prior to the NRC inspector's identification of the nonconformance. On each occasion, the general foreman felt the work completion was imminent and chose to leave the crate to remove the replaced motor.

Poor judgement was exercised throughout this event by the EM personnel involved. Had the conflict been appropriately escalated, the fire protection engineer would have allowed the crate to enter the auxiliary building after an action plan had been approved by plant management to ensure proper measures were in place consistent with the fire load hazard. Paragraphs 5.1.3 and 5.1.4 of PHYSI-13, Attachment E, are unclear in this aspect of TFL control; and the EM personnel were unaware this avenue existed.

This event was an example of individuals (a foreman and general foreman) violating known requirements. Reliance on worker adherence to procedures must be expected. Therefore, this event is not considered to have resulted from a weakness in the fire protection program's control of combustibles entering safety-related areas.

#### Corrective Steps That Have Been Taken and Results Achieved

The crating material was removed at approximately 1700 hours on October 11, 1990.

An evaluation of the safety implications of the unattended transient fire load was performed. If a fire had occurred the flame spread would have been slow since the majority of the crate consisted of thick timbers. The fire detection system was operable in the area and would have alerted the plant's fire response team before the flame spread could have affected nearby systems. In addition, the roving fire watch rounds were conducted hourly in the area and workers were present a significant amount of time. For these reasons, TVA concluded that the load was within the capability of the plant's fire protection system.

A problem evaluation panel was held with the responsible personnel and plant management to understand the circumstances under which the poor judgements were made and to determine the proper corrective action to prevent recurrence. The EM personnel involved have been counselled on the requirements of PHYSI-13 and the importance of escalating conflicts for appropriate resolution. They have also been given appropriate disciplinary action for knowingly violating procedures.

As a result of a number of recent events related to the fire protection program at SQN, a quality assurance audit and a generic event investigation were performed to determine if weaknesses existed in the program. The audit concluded that fire protection responsibilities and interfaces are not well understood and are not clearly defined. This conclusion was a contributing factor in this event; and corrective actions, including a clear definition of responsibilities and additional training, are in process. The generic event investigation concluded that additional priority should be placed on fire-protection-related issues in each responsible organization. This finding was also a contributing factor to the previously noted poor judgement. To address this finding, plant management will place additional emphasis on fire protection requirements and the responsibility of each organization in the plant plan of the day, staff, and safety meetings.

Corrective Steps That Will Be Taken To Avoid Further Violations

PHYSI-13, Attachment E, Paragraphs 5.1.3 and 5.1.4, will be revised by January 4, 1991, to clarify the requirements for allowing entry of untreated wood into safety-related areas. Paragraph 5.1.3 will discuss using treated wood for scaffolding when suitable noncombustible substitutes are not available. Paragraph 5.1.4 will clearly address the requirements related to unpacking equipment in safety-related areas that is shipped in untreated combustible packaging. This revision to PHYSI-13 will also clearly define and proceduralize organizational responsibilities. Training for maintenance personnel on this event will be factored into Nuclear Experience Review (NER) training. The lesson plan for NER training will be updated to include this event by January 4, 1991. Maintenance personnel will be trained by February 1, 1991.

Date When Full Compliance Will Be Achieved

TVA is in full compliance.



ENCLOSURE 2  
Summary of Commitments

1. PHYSI-13 will be revised to clarify the requirements for allowing entry of untreated wood into safety-related areas by January 4, 1991.
2. Training for maintenance personnel on this event will be factored into NER training. The lesson plan for NER training will be updated to include this event by January 4, 1991.
3. Maintenance personnel will be trained by February 1, 1991.