



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

Mark O. Medford
Vice President, Nuclear Assurance, Licensing and Fuels

JAN 03 1991

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) - NRC INSPECTION REPORT NOS. 50-327,
328/90-25 - RESPONSE TO NOTICE OF VIOLATION (NOV) 50-327, 328/90-25-01

Enclosed is TVA's response to B. A. Wilson's letter to
O. D. Kingsley, Jr., dated November 20, 1990, and to C. A. Julian's
letter to O. D. Kingsley, Jr., dated December 5, 1990, which transmitted
the subject NOV.

Enclosure 1 provides TVA's response to the NOV. Summary statements of
commitments contained in the submittal are provided in Enclosure 2.

If you have any questions concerning this submittal, please telephone
M. A. Cooper at (615) 843-8422.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark O. Medford

Enclosures
cc: See page 2

9101090169 910103
PDR ADOCK 05000327
PDR

080070

IE01
1/1

U.S. Nuclear Regulatory Commission

JAN 03 1991

cc (Enclosures):

Ms. S. C. Black, Deputy Director
Project Directorate II-4
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. J. N. Donohew, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

NRC Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy Daisy, Tennessee 37379

Mr. B. A. Wilson, Project Chief
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327/90-25 AND 50-328/90-25-01
B. A. WILSON'S LETTER TO O. D. KINGSLEY, JR.,
DATED NOVEMBER 20, 1990

Violation 50-327, 328/90-25-01

10 CFR 50, Appendix B, Criterion V as implemented by the Nuclear Quality Assurance Manual (NQAM) states that, "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings." Standard Practice SQA66, Plant Housekeeping (Rev. 18), provided administrative control of housekeeping requirements for work activities, conditions, and environments, that included requirements for work instructions, and worker and supervisor responsibilities during and following the conduct of maintenance or modification work.

Contrary to the above, prior to July 23, 1990, the licensee failed to implement instructions, procedures, and performance that would prevent the storage and/or accumulation of loose conductive material within safety related electrical boards. Specifically, numerous nuts, bolts, washers, lugs, copper and steel shavings, conduit plugs, and fuses were found stored or accumulated as a result of maintenance and/or modifications in numerous 120 volt AC and 125 volt DC vital distribution panels and instrumentation and control cabinets which could have rendered the panels inoperable during a seismic event.

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 cause of this violation was inattention to detail with respect to cleanliness requirements and good housekeeping practices by personnel involved in work activities in the low-voltage electrical panels. Based on the type of debris found in the panels, the violation appears to have occurred during previous modification work activities.

TVA acknowledges the similarity between this violation and the violation issued in 1988, which involved the storage or accumulation of fuses and other conductive material in 6900-volt (V) and 480-V equipment. A review of the corrective actions for Violation 50-327, 328/88-06-03 concluded that previous corrective actions focused on the high-voltage electrical panels and cabinets and were inadequate to prevent recurrence in the low-voltage electrical panels.

Corrective Steps That Have Been Taken and Results Achieved

Maintenance has inspected and cleaned the low-voltage electrical panels specifically identified during the NRC maintenance team inspection. The remaining low-voltage electrical panels have been inspected and cleaned, with the exception of eight panels which still require cleaning. A schedule to clean these eight panels has been developed, and the removal of the enclosures from service has been facilitated. Baseline cleaning in the eight enclosures will be completed by January 14, 1991.

To emphasize compliance with SQN Standard Practice SQA66, "Plant Housekeeping," training, which outlined each person's responsibilities with regard to good housekeeping practices, was provided to Modifications' personnel. Compliance with the requirements of SQA66 was also emphasized in a memorandum from the SQN Modifications Manager. The Modifications' foremen were directed to conduct personal inspections of electrical panels for cleanliness during the completion stages of applicable modification workplans. This inspection has been added as a requirement to Modification and Additions Instruction 7, "Cable Terminations, Splicing, and Repairing of Damaged Cables."

Corrective Steps That Will Be Taken To Avoid Further Violations

As an additional measure to prevent recurrence, periodic inspections by line management will be included in the routine housekeeping walkdowns performed in accordance with SQN Site Standard Practice 1.50, "Management and Radiological Emergency Plan Duty Roster." Appropriate procedure revisions will be made by January 14, 1991.

Date When Full Compliance Will Be Achieved

SQN will be in full compliance by January 14, 1991. Remaining corrective actions to prevent recurrence will also be completed by January 14, 1991.

ENCLOSURE 2

List of Commitments

1. Baseline cleaning of the low-voltage electrical panels will be completed by January 14, 1991.
2. Periodic inspection of electrical cabinets and panels will be included in the routine housekeeping walkdowns performed in accordance with SQN Site Standard Practice 1.50, "Management and Radiological Emergency Plan Duty Roster." Appropriate procedure revisions will be made by January 14, 1991.