



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

MAR 05 1984

Report Nos.: 50-327/84-02 and 50-328/84-02

Licensee: Tennessee Valley Authority
500A Chestnut Street
Chattanooga, TN 37401

Docket Nos.: 50-327 and 50-328

License Nos.: DPR-77 and DPR-79

Facility Name: Sequoyah 1 and 2

Inspection at Sequoyah site near Chattanooga, Tennessee

Inspectors:	<u><i>R. R. Marston</i></u>	<u>2/29/84</u>
	R. R. Marston	Date Signed
	<u><i>J. L. Kreh</i></u>	<u>2/29/84</u>
	J. L. Kreh	Date Signed
Approved by:	<u><i>G. R. Jenkins</i></u>	<u>2/29/84</u>
	G. R. Jenkins, Section Chief	Date Signed
	Division of Emergency Preparedness and Materials	
	Safety Programs	

SUMMARY

Inspection on February 7-10, 1984

Areas Inspected

This routine, unannounced inspection involved 52 inspector-hours on site in the areas of Emergency Detection and Classification, Protective Action Decision-making, Changes to the Emergency Preparedness Program, Shift Staffing and Augmentation, and Emergency Response Training.

Results

Of the five areas inspected, one violation was identified in the area of Changes to the Emergency Preparedness Program; no deviations were identified. This violation is discussed in paragraph 7.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *C. C. Mason, Plant Manager
- *J. B. Krell, Assistant Plant Superintendent
- *L. M. Nobles, Assistant Plant Superintendent
- *J. M. Anthony, Operations Supervisor
- *D. E. Crawley, Health Physics Supervisor
- *R. W. Fortenberry, Engineering Supervisor
- *J. E. Law, Quality Engineering Supervisor
- B. C. Lake, Shift Engineer
- D. S. Richardson, Shift Engineer
- W. D. Lovelace, Shift Engineer
- L. W. Smith, Training Supervisor
- M. A. Palmer, H.P. Shift Supervisor
- *G. B. Kirk, Mechanical Engineer-Compliance
- *K. Parr, Nuclear Engineer
- *E. K. Sliger, TVA REP Section Supervisor
- M. J. McGuire, TVA Records Mgt. Section Supervisor
- T. W. Youngblood, TVA Health Physicist

*Attended exit interview.

2. Exit Interview

The inspection scope and findings were summarized on February 10, 1984, with those persons indicated in paragraph 1 above. The inspector discussed an apparent violation of NRC requirements with those present. Licensee management acknowledged the inspector's findings and agreed to take corrective action within 30 days.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Emergency Detection and Classification

The inspector reviewed the initiating conditions and EALs in the Sequoyah Emergency Plan and Implementing Procedures and verified that they were consistent with those in NUREG-0654, Appendix 1. The Sequoyah Implementing Procedures for the four classes of emergencies (IP-2 through IP-5) specify that notification to the Operations Duty Specialist of an emergency shall

be made within five minutes, and DNPEC Implementing Procedures IP-2 through IP-5 specify that the Operations Duty Specialist shall notify State and local authorities within five minutes of receiving notification from the plant.

The inspector reviewed a letter from the Tennessee Emergency Management Agency which verified that the State had reviewed and concurred in TVA's Emergency Action Levels within the past year.

Three Shift Engineers were interviewed by the inspectors. They were given simulated plant emergency indications and asked to classify the emergency. The Shift Engineers demonstrated that they could accurately classify emergencies.

Several Control Room instruments and indicators were inspected to determine that the ranges were adequate for the full range of Emergency Action Levels (EALs). All indicators had adequate ranges with the exception of the river level indicators. This indicator ranged from 672 feet to 697 feet, while the low and high water EALs were 655 feet and 723 feet. The Sequoyah Technical Specifications showed that water levels were controlled with a series of dams. TVA's Reservoir Operations organization maintains surveillance of water levels and notifies the Sequoyah Plant at designated levels. The inspector agreed that this means is adequate to keep the Control Room staff informed on the water levels through the full range of EALs.

The inspector reviewed the Emergency Operating Instructions (EOIs) and Abnormal Operating Instructions (AOIs) to determine whether, where appropriate, the Instructions were cross-referenced to the Implementing Procedures used for classification of emergencies. Three of the six EOIs and several of the AOIs reference SQN IP-1. The inspector stated that at least five of the six EOIs should reference SQN IP-1 and that the AOIs should be evaluated with respect to including such a reference. A licensee representative stated that the EOIs were undergoing review and would likely be revised or changed to AOIs by July 1, 1984. The inspector stated that this would be an inspector followup item (327,328/84-02-01) and would be evaluated during a subsequent inspection.

6. Protective Action Decisionmaking

The inspector reviewed the Sequoyah Emergency Plan and Implementing Procedures and determined that staff and responsibility are assigned by the licensee to assess accidents and make protective action recommendations.

The inspectors interviewed three Shift Engineers. The Shift Engineers were aware of their authority and responsibility when acting as Emergency Director and were also aware of the responsibilities of other members of the emergency response staff. They were also aware that protective action recommendations made to State and local agencies are based on plant conditions as well as on Protective Action Guides.

The inspector had no further questions in this area.

7. Changes to the Emergency Preparedness Program

The inspectors discussed changes to the Sequoyah Nuclear Plant emergency preparedness program with licensee representatives and reviewed procedures and documentation pertaining to such changes. Changes to the Implementing Procedures are processed in accordance with Administrative Instruction #4, Plant Procedures, Document Control. A review is conducted at Plant level by the Plant Operations Review Committee. Emergency Plan changes are processed at the corporate level.

Changes to Implementing Procedures are distributed by Plant Services to in-plant holders of the documents, including the NRC Resident Inspector. Distribution off-plant and all distribution of Emergency Plan changes are made by TVA headquarters in Chattanooga.

Processing and distribution of Emergency Plan and Implementing Procedure changes were made in accordance with Plant and TVA procedures and regulatory requirements; however, one exception was noted. Revisions to the Central Emergency Control Center Implementing Procedures Document dated November 9, 1983, the Division of Nuclear Power Emergency Center Implementing Procedures Document dated November 9 and November 10, 1983, and the Muscle Shoals Emergency Center Implementing Procedures document dated October 4, 1983, were sent to the NRC Office of Nuclear Reactor Regulation and Region II with a letter of transmittal dated January 3, 1984. The inspector stated that this delay in transmitting the Implementing Procedures was a violation of 10 CFR 50, Appendix E, V. (327,328/84-02-02) which requires licensees to submit one copy of any changes to the emergency plan or procedures to the Administrator of the appropriate Regional Office, and two copies to the Document Control Desk within 30 days of such changes. The Supervisor, TVA Radiological Emergency Preparedness Section, stated that the violation occurred, that the cause had been identified, and that corrective action would be taken within 30 days.

8. Shift Staffing and Augmentation

The inspector reviewed the Radiological Emergency Plan Figure 2, Emergency Plan Organization, and Section 4 and the Appendices to the Plan. This area was also discussed with licensee representatives. It was determined that the shift staffing and augmentation goals of NUREG-0654, Figure B-1, were met. Sequoyah Implementing Procedures provide for activating the Technical Support Center (TSC) and Operations Support Center (OSC). CECC, DNPEC, KEC, and MSEC Implementing Procedures provide for activation of the other TVA Emergency Centers which support Sequoyah.

The inspector determined, from a review of the Emergency Plan and discussion with licensee representatives, that the TSC would be staffed by sufficient technical, engineering, and senior designated licensee officials and be fully functional within one hour after activation. Licensee representatives stated that the TSC augmentation time had not been formally measured, but had been based on an analysis of residence distances from the plant.

The inspector had no further questions in this area.

9. Training

The inspectors reviewed a sample of emergency response organization training records. A lesson plan for Site Emergency Directors and TSC staff indicated training was concentrated primarily on the Implementing Procedures. The training sessions lasted three hours and included student participation. Training sessions for upper management and supervisory personnel also included the Shift Engineers. Emergency response training was also reviewed for Operators, OSC staff, Health Physics, Public Safety (Security), and Plant Medical personnel.

Training sessions were also provided for local police and fire departments in the fourth quarter of CY 1983.

Lesson outlines for TVA offsite support personnel were reviewed. A training schedule is prepared quarterly showing dates of last training and due dates for the re-training. A licensee representative stated that personnel who are not current on their training are deleted from the emergency response call lists.

The inspectors had no further questions in this area.