

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

March 15, 1984

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION
REPORT - 50-327/84-01 AND 50-328/84-01 - RESPONSE TO VIOLATIONS

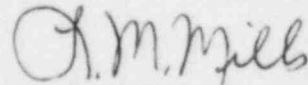
The subject OIE inspection report dated February 14, 1984 from
R. C. Lewis to H. G. Parris cited TVA with one Severity Level IV
violation and one Severity Level V violation. Enclosed is the response to
the items of violation in the subject inspection report.

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



L. M. Mills, Manager
Nuclear Licensing

Enclosure

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

Records Center (Enclosure)
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

8407180274 840705
PDR ADOCK 05000327
Q PDR

ENCLOSURE

RESPONSE - NRC INSPECTION REPORT
NOS. 50-327/84-01 AND 50-328/84-01
R. C. LEWIS'S LETTER TO H. G. PARRIS
DATED FEBRUARY 14, 1984

Item 327, 328/84-01-01

10 CFR 55, Appendix A, Paragraph 3.d, requires that each licensed operator and senior operator review the contents of all abnormal and emergency procedures on a regularly scheduled basis.

Contrary to the above, each licensed operator and senior operator has not reviewed the contents of all abnormal and emergency procedures in that the licensee could not present objective evidence to verify that any of four licensed operators selected for review had completed their required reading.

This is a Severity Level IV 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

The cause of this violation has been attributed to insufficient administrative control of the Abnormal Operating Instruction (AOI) and Emergency Operating Instruction (EOI) monthly review process, aggravated by the 24-month review cycle.

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

An audit was performed to verify the review status for all licensed operators. Based on the information gained from this audit, an AOI and EOI monthly review letter was issued to each licensed operator indicating the instructions to be reviewed to update each operator's review requirement.

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

Procedures have been revised to provide more positive control over the review process. Additionally, the AOI and EOI review cycle has been changed to a 12-month cycle.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 1, 1984.

Item 327, 328/84-01-02

10 CFR 50, Appendix B, Criterion XIII as implemented by the licensee's QA Program (TVA-TR75-1) require that measures shall be established to control storage of materials to prevent damage. TVA-TR75-1 commits to Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water Cooled Nuclear Power Plants. This guide endorses ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants. Section 6.3.2 of this standard requires that items stacked for storage shall be arranged so that racks, cribbing, or crates are bearing the full weight without distortion of the item.

Contrary to the above, several boxes containing reactor plant equipment identified as control rod drive mechanisms, located in Outside Building One, were stacked in such a manner that allowed bending of some containers which could result in distortion of the parts inside the containers.

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

1. Admission or Denial of the Alleged Violation

TVA denies that a violation occurred.

2. Reason for the Denial

ANSI N45.2.2-1972, Section 6.3.2, "Arrangement of Items," specifies that items stacked for storage shall be arranged so that the racks, cribbing, or crates are bearing the full weight without distortion of the items. This requirement is to prevent permanent distortion of the items contained in the storage container. Although the crate was marked as containing a control rod drive mechanism (CRDM), the crate actually contained only gaskets. In a recent telecon, Westinghouse stated that had the crate in fact contained a CRDM and had the CRDM been subjected to the same deflections as the crate (1 3/4 inch over 10 ft.), no adverse effects to the CRDM or its intended function would have occurred. Additionally, there is no evidence to indicate that the deflection of the crate would have resulted in an equal deflection of any items in the crate. The deflection of the crate containing gaskets may have resulted in minor deflection of the gaskets but not in a way that permanent distortion of any gasket would occur. All items stored in the crates identified by the NRC inspector were evaluated and inspected and no distortion was found.