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R.J. Adney
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Sequoyah Nuclear Plant

November 22, 1995

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

Gentlemen:

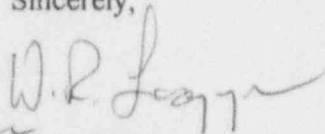
In the Matter of) Docket Nos. 50-327
Tennessee Valley Authority) 50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327,
328/95-20 - REPLY TO NOTICE OF VIOLATION (NOV) 50-327, 328/95-20-01

Enclosed is TVA's reply to Mark S. Lesser's letter to Oliver D. Kingsley, Jr., dated October 25, 1995, which transmitted the subject NOV. The violation is associated with the failure to follow procedures and/or inadequate procedures pertaining to clearances. A list of commitments is included in Enclosure 2.

If you have any questions regarding this response, please telephone J.W. Proffitt at (423) 843-6651.

Sincerely,


R. J. Adney

Enclosures
cc: See page 2

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cc (Enclosure):

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ENCLOSURE
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327, 328/95-20
MARK S. LESSER'S LETTER TO O. D. KINGSLEY, JR.
DATED OCTOBER 25, 1995

VIOLATION 50-327, 328/95-20-01

"Technical Specification 6.8.1 requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33 includes administrative procedures for equipment control (e.g., locking and tagging).

"SSP-12.3, EQUIPMENT CLEARANCE PROCEDURE, Revision 10, was the licensee's administrative procedure which implemented the requirements of TS 6.8.1 for equipment control involving tagouts. The procedure was established, in part, to provide protection for personnel and plant equipment during operation, maintenance, and modification activities through the use of clearances. The procedure specifically required (1) clearances to be established prior to maintenance activities commencing, (2) that evaluation and necessary actions to prevent inadvertent operation of components be incorporated in the establishment of a clearance, and (3) that clearances on one unit that effect systems common to the other unit be carefully evaluated to assure conditions on both units allow the equipment to be removed from service.

"Contrary to the above;

1. On September 9, 1995, the licensee failed to establish a clearance prior to performing maintenance activities on a sample sink cooler resulting in injury to a maintenance technician when the sample sink cooler ruptured.
2. On September 17, 1995, during operations removal of a clearance boundary (replacing fuses for valve operation), the licensee failed to incorporate the necessary actions to prevent inadvertent operation, which caused valves to reposition to open when fuses were reinstalled, resulting in approximately 1300 gallons of borated water being unintentionally injected into the Unit 1 Reactor Coolant System from the cold leg accumulators.
3. On September 17, 1995, the licensee failed to establish a clearance for manually stroking of an MOV during MOVATs testing resulting in approximately 500 gallons of Refueling Water Storage Tank water gravity draining unintentionally into the Unit 1 Reactor Coolant System.
4. On September 25, 1995, the licensee failed to evaluate the effects of a clearance on components common to both units which resulted in four flow switches on the

Emergency Gas Treatment System being unintentionally deenergized and resulted in both trains of the Emergency Gas Treatment System being degraded.

"This is a Severity Level IV violation (Supplement 1)."

REASON FOR THE VIOLATION

A comprehensive review of the clearance process and procedure was performed. The review evaluated the four examples listed in Inspection Report 95-20, the example listed in Inspection Report 95-21, and other examples to determine the reason for the violation.

The reason for the violation is that the site procedure defining the clearance process does not adequately address some aspects of the clearance process. Although interface programs (e.g., postmaintenance testing and MOVATS) contain specific details regarding the activity being performed, they do not interface well with the clearance procedure. Also, it was determined that inadequate work practices (resulting from working around the procedure) contributed to the violation.

The site clearance procedure is fragmented in its description of some key activities. The clearance process provides a safe work environment but does not always provide for the control of equipment within the boundary of the clearance when the manipulation of equipment is required to support the activity or in release of the clearance. The implementation of the clearance process is accomplished based on individuals' knowledge of how the process should work.

As an interim action, the clearance procedure has been strengthened. The procedure has been revised to ensure that equipment under the control of the Chemistry and Instrument Maintenance groups is properly removed from service before a work activity can be performed. This equipment is limited to components pertaining to chemistry instrumentation and sampling equipment and other plant instrumentation. The revision addresses operating a component within a clearance and added information pertaining to the relationship between handswitches and their associated end devices when tagged. Guidance will be provided to the clearance writers and reviewers and appropriate implementation personnel to ensure lessons learned from these and other related issues are understood. Also, guidance pertaining to the use of nonstandard diagrams and drawings will be provided to clearance writers and reviewers.

To achieve long-term improvement, a clear and precise clearance procedure will be developed. The procedure will be streamlined to ensure that the clearance process interfaces well with work control processes and maintains a safe work boundary. The appropriate personnel will be trained on the new clearance procedure, and expectations regarding the implementation of the process will be provided.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

As an interim action, the clearance procedure has been strengthened. The procedure was revised to accomplish the following:

1. Ensure that equipment under the control of the Chemistry and Instrument Maintenance groups is properly removed from service before a work activity can be performed.
2. Address operating a component within a clearance.
3. Provide information pertaining to the relationship between handswitches and their associated end devices when tagged.

THE CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FUTURE VIOLATIONS

Guidance will be provided to the clearance writers and reviewers and appropriate implementation personnel to ensure lessons learned from these and other related issues are understood. Also, guidance pertaining to the use of nonstandard diagrams and drawings will be provided to clearance writers and reviewers.

To achieve long-term improvement, a clear and precise clearance procedure will be developed after benchmarking and process redesign to ensure that the clearance process interfaces well with work control processes and maintains a safe work boundary. The appropriate personnel will be trained on the new clearance procedure, and expectations regarding the implementation of the process will be provided.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA will be in full compliance before the Unit 2 Cycle 7 refueling outage at the completion of the corrective actions.

ENCLOSURE 2
COMMITMENTS
INSPECTION REPORT 95-20

1. Guidance will be provided to the clearance writers and reviewers and appropriate implementation personnel to ensure that lessons learned from these and other related issues are understood. Also, guidance pertaining to the use of nonstandard diagrams and drawings will be provided to clearance writers and reviewers. These actions will be completed by December 10, 1995.
2. A clear and precise clearance procedure will be developed to ensure that the clearance process interfaces well with work control processes and maintains a safe work boundary. This action will be completed by February 23, 1996.
3. Training of the appropriate personnel will be conducted on the new clearance procedure, and expectations regarding the implementation of the process will be provided. This action will be completed before the Unit 2 Cycle 7 refueling outage.