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J. L. Wilson
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June 12, 1992

U.S. Nuclear Regulatory Commission
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Gentlemen:

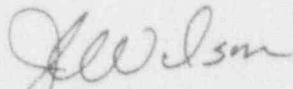
In the Matter of) Docket Nos. 50-327
Tennessee Valley Authority) 50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327,
328/92-11 - REPLY TO NOTICE OF VIOLATION (NOV) 50-328/92-11-02

The enclosure contains TVA's response to Bruce A. Wilson's letter to M. O. Medford dated May 13, 1992, which transmitted the subject NOV. This violation deals with the failure to maintain configuration control for the spent fuel pit coolant system resulting in a release of water to the reactor cavity.

If you have any questions concerning this submittal, please telephone M. A. Cooper at (615) 843-8924.

Sincerely,


J. L. Wilson

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission
Page 2
June 12, 1992

Enclosure

cc (Enclosure):

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Enclosure 1

RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327/92-11 AND 50-328/92-11
BRUCE A. WILSON'S LETTER TO M. O. MEDFORD
DATED MAY 13, 1992

Violation 50-328/92-11-02

"Technical Specifications (TS) 6.8.1 requires, in part, that written procedures shall be established, implemented and maintained, which includes procedures for configuration control.

"Administrative Instruction (AI) 30, NUCLEAR PLANT CONDUCT OF OPERATIONS, Section 7.0 implements TS 6.8.1 requirements with assignments of responsibility for all levels of licensed and non-licensed operators. The procedure requires, in part, that correct performance of operating activities are accomplished including operational compliance with instructions.

"Administrative Instruction (AI) 58, MAINTAINING COGNIZANCE OF OPERATION STATUS - CONFIGURATION STATUS CONTROL, Section 4.1, implements TS 6.8.1 requirements in regard to configuration control. The procedure requires, in part, that all levels of licensed and non-licensed operators are responsible for ensuring that configuration control is maintained.

"System Operating Instruction (SOI) 78.1, SPENT FUEL PIT COOLANT SYSTEM OPERATION, implements TS 6.8.1 requirements in establishing specific controls for Spent Fuel Pit Coolant System evolutions.

"Contrary to the above, the requirements of TS 6.8.1 were not followed, in that, on April 15, operators failed to comply with the requirements of AI-30 and AI-58. Operators failed to maintain configuration control for the Spent Fuel Pit Coolant System resulting in a release of water into a maintenance area in the refueling cavity with the unit in Mode 6. Also, operators did not follow the requirements of SOI-78.1, in that, they failed to properly perform step G.IV.A.2 of SOI-78.1, which resulted in a release of water into a maintenance area of the reactor cavity through an improperly aligned flowpath. In addition, AI-58 was inadequate in that it did not identify specific configuration controls for the Spent Fuel Pit Coolant System during Modes 5 and 6.

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

Reason for the Violation

AI-58 did not require the spent fuel pit coolant system (SFPCS) to be controlled in the configuration control status files during Modes 5 and 6. Operations developed an informal process to track and maintain cumulative status, which did not effectively maintain configuration control.

The transfer of signatures (for completed steps) from one evolution checklist to another was allowed, rather than reverifying the required information. This was done to eliminate unnecessary time and personnel exposure for duplicate verifications. Multiple evolution checklists were being run, sometimes simultaneously, to expedite completion and transition from one

activity to the next in order to reduce individual radiological exposure and airborne contamination. The informal tracking process was not sufficiently understood by all individuals, and communication of the status of the SFPCS activities was incomplete. As a result, system and component statuses were not current or accurate.

Corrective Steps That Have Been Taken and Results Achieved

The operators immediately isolated the valves that allowed water to flow from the refueling water storage tank to the cavity.

A complete rerun of the SOI-78.1G valve checklist was performed prior to additional SFPCS valve manipulations to regain configuration control of the system.

The practice of transferring signatures from one valve checklist to another was stopped.

A standing order was issued requiring configuration log entries for all surveillance instructions, SOIs, or system operations in progress that require component deviation from normal status file alignment.

Meetings were conducted with the Operations staff to discuss Operations' performance and emphasize the rigorous and consistent application of basic operational tools such as configuration control, shift turnover, procedure use, and daily journal entries as necessary aids in everyday performance of work to prevent mistakes.

A separate meeting was conducted with the onshift assistant shift operations supervisors (ASOSs) to discuss performance and required improvements. The ASOSs were tasked to identify problem areas and associated solutions. This meeting resulted in a consensus that Operations' performance needs improvement and a commitment to improve. Areas recommended for improvement include professionalism, delegation of responsibilities, shift manning, succession planning and encouraging performance, senior reactor operator input to plant work activities, communications, and configuration control.

Corrective Steps That Will be Taken to Avoid Further Violations

The SOI for the SFPCS will be revised to include the use of one standby checklist to remain in configuration control and to implement a configuration control process when different sections are in work. The revision will also include a common status checklist to minimize the number of valves requiring manipulation and verification. Also, the number of checklists that must be performed during cavity draindown will be minimized.

The configuration control procedure will be revised to require configuration log entry for SOIs in process. The revision will also include requirements to maintain configuration control of the spent fuel coolant system during Modes 5 and 6.

A formal turnover procedure for unique, outage-related Operations positions will be developed to ensure that a face-to-face turnover of information occurs. As an interim measure until the configuration control procedure has been revised and training has been conducted, an additional unit operator is being utilized as the central point of contact for configuration control. His sole responsibility is to ensure that configuration changes are properly logged and controlled for both units and common equipment.

A task force is being established to review and streamline the configuration control process. Recommendations provided will be incorporated into the configuration control procedure, and in-depth training will be conducted.

Date When Full Compliance Will be Achieved

SQL is in full compliance.

Enclosure 2

INSPECTION REPORT 50-327, 328/a2-11
COMMITMENT LIST

1. The system operating instruction (SOI) for the spent fuel pit coolant system will be revised by March 8, 1993, to: (1) include the use of one standby checklist to remain in configuration control and to implement a configuration control process when different sections are in work, (2) include a common status checklist to minimize the number of valves requiring manipulation and verification, and (3) minimize the number of checklists that must be performed during cavity draindown.
2. The configuration control procedure will be revised by March 8, 1993, to require configuration log entry for SOIs in process. The revision will also include requirements to maintain configuration control of the spent fuel coolant system during Modes 5 and 6.
3. A formal turnover procedure for unique, outage-related Operations' positions will be developed by March 8, 1993, to ensure that a face-to-face turnover of information occurs.