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J. L. Wilson
Vice President, Sequoyah Nuclear Plant

July 15, 1992

U.S. Nuclear Regulatory Commission
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Gentlemen:

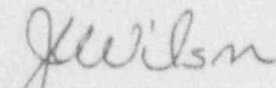
In the Matter of) Docket Nos. 50-327
Tennessee Valley Authority) 50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327,
328/92-09 - REPLY TO A NOTICES OF VIOLATION (NOVS) 50-327, 328/92-09-02
AND 92-09-04

Enclosed is TVA's response to S. D. Ebnetter's letter to M. O. Medford dated June 15, 1992, which transmitted the subject NOV's involving deficiencies in the in-service inspection (ISI) program. The first NOV concerned failure to follow procedures for the placement of the lead letter "F" adjacent to the penetrometer for radiographs which utilize a film side penetrometer. The second NOV pertained to failure to ensure NDE program review of work orders and work authorizations, which resulted in two new welds not being added to the ISI weld map.

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

Sincerely,


J. L. Wilson

Enclosures
cc: See page 2

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cc (Enclosures):

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Enclosure 1

RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327/92-09 AND 50-328/92-09
STEWART D. EBNETER'S LETTER TO MARK O. MEDFORD
DATED JUNE 15, 1992

Violation 50-327/92-09-01

"10 CFR 50, Appendix b, Criterion V, states in part that activities affecting quality shall be prescribed by documented instructions, procedures and drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions procedures and drawings. The licensee's Radiography Procedure, NRT-1, Paragraph 7.8.1, requires that a lead letter "F" be adjacent to the penetrameter.

"Contrary to the above, on March 28, 1992, radiographs were observed where the radiographer had placed the lead letter "F" on the penetrameter in the area of interest. The placement of the lead letter "F" resulted in the resolution of the essential 4T hole being obscured.

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

Reason for the Violation

TVA procedure, N-RT-1, requires the lead letter "F" to be placed "adjacent" to the penetrameter. TVA has interpreted "adjacent" to include "on top of," consistent with a 1981 American Society of Mechanical Engineers (ASME) Section V Code Interpretation V-81-13, the 1986 edition of the ASME Section XI code, and the definition of "adjacent." Inspection Report 92-09 indicated that placement had "tended" to mask the inspector's resolution of the hole; however, from further review, NRC concluded that the essential 4T hole could be seen. Therefore, there was no need to re-radiograph the associated welds as the required film sensitivty was satisfied.

Corrective Steps That Have Been Taken and Results Achieved

A temporary procedure change was issued on March 31, 1992, to clarify that the "F" may be placed on the penetrameter provided the image of the letter does not obscure the requisite hole and the edges of the penetrameter.

Corrective Steps to be Taken to Avoid Further Violations

Corrective actions taken in the form of the procedural clarifications are considered adequate to avoid further violations.

Date When Full Compliance Was Achieved

Full compliance was achieved on March 31, 1992, upon issuance of the temporary procedure change.

Violation 50-327/92-09-02

"10 CFR 50, Appendix B, Criterion V, states in part that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

"Contrary to the above, on April 1, 1992, (In Service Inspection) ISI Repair and Replacement Procedure, SSP-6.9, did not fully designate responsibility for including the ISI personnel in the review of work orders and work authorizations. As a result, two new welds, which had been added by Maintenance on Work Order C003957, had not been added to the ISI weld map and, therefore, were not included in the ISI program.

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

Reason for the Violation

This violation involved an in-service inspection (ISI) weld map that did not reflect two welds depicted on the corresponding plant weld map. These two welds were added during a maintenance activity. Following the maintenance activity that added the welds, the ISI personnel were not notified to update the ISI weld map. The procedure that controls maintenance activities did not contain sufficient positive controls for ASME Section XI components to notify ISI of weld replacements or addition of new welds. Typically, maintenance activities do not involve the addition of new welds; therefore, this condition was considered limited.

Corrective Steps That Have Been Taken and Results Achieved

A 100 percent review of the 81 total ISI weld maps versus the plant weld maps was conducted. This review was performed to ensure that the problem was isolated. Through this review, a small number of discrepancies, such as new weld numbers for replacement welds, were identified. No additional missing welds were identified.

The ISI repair and replacement procedure has been revised to require site ISI personnel to review all ASME Section XI work documents. It ensures that the responsible section for notifying ISI when ISI maps are affected by maintenance activities is clearly delineated.

Corrective Steps to be Taken to Avoid Further Violations

The site procedure governing welding and NDE inspections will be revised to provide updated information to the ISI personnel through copies of inspection reports for pre-service and in-service exams. Additionally, a formal qualification program for individuals involved in planning Section XI work will be established to ensure that requirements are properly implemented.

Date When Full Compliance Was Achieved

Full compliance was achieved on June 8, 1992, when the procedure governing ISI repairs and replacements was revised.

Enclosure 2

COMMITMENTS

1. The site procedure governing welding and NDE inspections will be revised by September 1, 1992, to provide updated information to the in-service inspection personnel through providing copies of inspection reports for pre-service and in-service exams.
2. A formal qualification program for individuals involved in planning Section XI maintenance activities will be established by August 1, 1992, to ensure that requirements are properly implemented.