

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

December 21, 1984

84 DEC 26 P 1:26  
U.S. Nuclear Regulatory Commission  
Region II

Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/84-18 AND 50-328/84-19 - REVISED RESPONSE TO VIOLATION

The subject OIE inspection report dated September 21, 1984 from R. C. Lewis to H. G. Parris cited TVA with one Severity Level IV Violation. TVA's initial response to the subject inspection report was provided to NRC by the October 22, 1984 letter from L. M. Mills to you. In response to the November 20, 1984 letter from J. A. Olshinski to H. G. Parris, enclosed is a revised response to the item of violation. The delay in the submittal of this response was discussed with S. Weise of your staff in a telephone conversation on December 20, 1984.

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

*J. A. Domer*  
J. A. Domer  
Nuclear Engineer

Enclosure

cc (Enclosure):

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

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

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ENCLOSURE

RESPONSE - NRC-OIE INSPECTION REPORT  
NOS. 327/84-18 AND 328/84-19  
R. C. LEWIS' LETTER TO H. G. PARRIS  
SEPTEMBER 21, 1984

Items 327/84-18-01 and 328/84-19-01

10 CFR 55 Appendix A.4(a) states that annual written examinations which determine areas in which retraining is needed to upgrade licensed operator and senior operator knowledge shall be included in the requalification program.

Contrary to the above, a licensee instructor at Sequoyah who is a licensed Senior Reactor Operator and who only taught a portion of the requalification program was exempted from the 1983 Sequoyah annual written examination.

This is a Severity Level IV violation (Supplement 1) applicable to Sequoyah Units 1 and 2 only.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The Sequoyah Nuclear Plant licensed operator requalification training program, at the time of the incident, was being carried out under Operations Section Training Instruction Letter (OSLT-1, which allowed for the exemption of three licensed personnel. Those exempt were to have had primary responsibility in administering the requalification training. The wording in the OSLT was in accordance with revision 61 of the FSAR dated May 1979; however, due to recent reinterpretation of 10 CFR 55, Appendix A.4 and Generic Letter 84-14, we exempted the instructor from the entire annual requalification examination in error.

3. Corrective Action Taken and Results Achieved

Since the issuance of Generic Letter 84-14 requiring licensed facilities to provide greater detail of their retraining programs in a revision to the FSAR, all licensed personnel at Sequoyah have been required to take the full requalification examination, and no persons will be exempt. The instructor involved has already taken and satisfactorily completed the 1984 requalification examination. TVA plans to continue this practice until approval of our submittal to Generic Letter 84-14. At that time, the requalification program will be conducted as approved by NRC from this submittal.

4. Corrective Actions Taken to Avoid Further Violations

As stated in item 3, our response to Generic Letter 84-14 will provide more detail to our retraining program and should eliminate any misinterpretation of NRC positions on this matter. Furthermore, this submittal will confirm our program. The submittal should be forwarded to NRC by April 15, 1985.

5. Date When Full Compliance Will Be Achieved

Sequoyah Nuclear Plant will complete the 1984 requalification program with all licensed personnel completing the examination by January 1, 1985.