

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

1630 Chestnut Street Tower II

January 18, 1985 JAN 22 P 2:03

U.S. Nuclear Regulatory Commission
Region II
ATTN: 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
50-327/84-33 AND 50-328/84-33 - RESPONSE TO VIOLATIONS

The subject OIE Inspection Report dated December 13, 1984 from D. M. Verrelli to H. G. Parris cited TVA with two Severity Level V violations. Enclosed is the response to the item of violation in the subject inspection report. The delay in submittal of this response was discussed with Steve Weise of your staff on January 14, 1985.

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

David J. Lambert

D. L. Lambert
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

8503060148 850130
PDR ADOCK 05000327
G PDR

RESPONSE - NRC-OIE INSPECTION REPORT
NOS. 50-327/84-33 AND 50-328/84-33
D. M. VERRELLI'S LETTER TO H. G. PARRIS
DATED DECEMBER 13, 1984

Items 327/84-33-01 and 328/84-33-01

10 CFR 50.54(a)(1) requires Tennessee Valley Authority (TVA) to implement the Quality Assurance Program described or referenced in its Safety Analysis Report. Section 17.2.10 of the TVA QA Program requires that inspections be performed on components during storage that affect quality to verify conformance with the applicable requirements. Procedure II-19 requires that batteries be inspected after they are placed on charge.

Contrary to the above, the batteries for the fifth emergency diesel generator were not inspected after charged between January and June 1982.

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

1. Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation if Admitted

An approved procedure to change the specific gravity was issued by the Office of Engineering (OE), formerly known as the Division of Engineering Design (EN DES), on December 30, 1981. At this time, the batteries were placed on charge so they would be fully charged when the vendor arrived to correct specific gravity, and the Division of Construction (CONST) was notified that the vendor would be onsite January 29, 1982. Checking of the batteries prior to the dilution of the electrolyte by the vendor was not done, since the specific gravity was to be changed by the vendor. After the batteries were modified, the vendor informed CONST personnel that it would take approximately six weeks for the electrolyte to mix to allow for proper readings. During this time, Inspection Instruction No. 19 (II-19) was being reactivated and there was a further delay in getting an inspector certified to check the batteries. An inspector was certified on May 25, 1982, and documented testing was begun on June 1, 1982.

3. Corrective Action Taken And Results Achieved

Inspectors have been certified, and the subsequent inspections of the batteries were documented. The Inspection Instruction will remain in place until all such equipment is transferred to Sequoyah Electrical Maintenance.

4. Corrective Action Taken To Avoid Further Violations

Management and workers involved have been instructed to take a more active response in ensuring that equipment in storage is being inspected in accordance with appropriate procedures.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 1, 1982.

Items 50-327/84-33-02 and 50-328/84-33-02

10 CFR 50.54(a)(1) requires TVA to implement the Quality Assurance Program described or referenced in its Safety Analysis Report. Section 17.1A.5 of the TVA QA program requires that documented instructions are followed for all activities under the scope of this section. Construction Procedure P-4 specifies that meggers are calibrated daily per Appendix A. Appendix A requires the user of a megger to sign the Megger Daily Calibration Log on each day the megger is used.

Contrary to the above, a QC inspector did not sign the Megger Daily Calibration Log as required for each day a megger was used.

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

1. Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation if Admitted

During inspection of cable in storage, an inspector failed to sign the Megger Daily Calibration Log, due to a misinterpretation of Inspection Instruction No. 32 (II-32). The employee assumed that the signature on II-32 Data Sheet No. 6 was verification that the megger had been calibrated in accordance with Sequoyah Construction Procedure CP-P4, and that this was all that was required.

3. Corrective Action Taken And Results Achieved

The employee was re-instructed on both II-32 Data Sheet No. 6 and Megger Daily Calibration Log, CP-P4, in that he was to sign the log to indicate that the comparison was made.

4. Corrective Action Taken To Avoid Further Violations

Sequoyah Construction Procedure CP-P4 is being revised to provide clarification on daily comparison checks, and to require yearly calibration of meggers. This revision should be completed by February 4, 1985.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 13, 1984.