

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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FEB 27 1988

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. 50-327/87-71 AND
50-328/87-71 - RESPONSE TO NOTICE OF VIOLATION

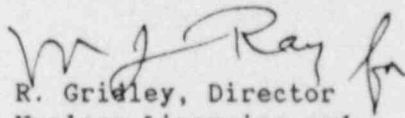
Enclosed is my response to K. P. Barr's letter to S. A. White dated
January 22, 1988, that transmitted Notice of Violations 50-327, -328/87-71-01,
-02, -03, and -04.

Enclosure 1 provides my response to the Notice of Violation. Enclosure 2
contains a list of commitments contained in this submittal. I do not
recognize any other items described herein as commitments.

If you have any questions, please telephone M. R. Harding at 615/870-6422.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

Enclosures
cc: See page 2

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cc (Enclosures):

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ENCLOSURE
RESPONSE TO NRC INSPECTION REPORT NUMBERS
50-327/87-71 AND 50-328/87-71
K. P. BARR'S LETTER TO S. A. WHITE
DATED JANUARY 22, 1988

Violation 50-327, -328/87-71-01

"10 CFR 50, Appendix A, general design Criterion 56, states that each line that connects directly to the containment atmosphere and penetrates primary reactor containment shall be provided with containment isolation valves, unless it can be demonstrated that the containment isolation provisions for a specific class of lines, such as instrument lines, are acceptable on some other defined basis. TVA design criteria implements this requirement for instrument lines in Sequoyah design criteria SQN-DC-V-2.15. Design criteria SQN-DC-V-2.15 states, in part, that all test vent, drains and test connections shall, as a minimum, include one manual valve and a capped, threaded nipple.

10 CFR 50, Appendix B, Criterion III, Design Control, states, in part, that measures shall be established to assure that applicable regulatory requirements and the design basis are correctly translated into drawings, procedures and instructions. Design changes shall be subject to design control measures commensurate with those applied to the original design. Administrative instruction (AI)-19, part IV, Plant Modification: After Licensing, implements this requirement through the issuance of design change notices (DCN) and work plans (WP) when modifications are required on safety related systems.

Contrary to the above, DCN X00028A and WP 12635 failed to incorporate Sequoyah design criteria SQN-DC-V-2.15, in that test connection lines for instruments 30-46B, 30-47B and 30-48B do not have caps installed.

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

Admission or Denial of the Alleged Violation

TVA admits the violation.

Reason for the Violation

The root cause of this event was a misinterpretation of General Design Criteria (GDC) 56 by design engineers. The system was originally designed with one valve and a cap. Subsequent regulatory positions changed and required two isolation valves. Division of Nuclear Engineering (DNE) Electrical Engineering Branch (EEB) personnel revised the design to delete the cap and install the two isolation valves in accordance with GDC-56. After this design change had been implemented, Design Criteria SQN-DC-V-2.15, part 5.1.2.2b, was issued to require two isolation valves and a cap. The design drawings were inadvertently not updated to reflect the revised design criteria.

Corrective Steps That Have Been Taken

DCN X00028B has been issued for field change request (FCR) 6363R1 to add caps to meet design criteria of SQN-DC-V-2.15. WP 12635 has been completed that installed the caps on unit 2.

Corrective Steps That Will Be Taken to Avoid Further Violations

DNE/EEB employees will be instructed by memorandum to ensure inclusion of the required caps on design drawings. DNE will perform training to ensure EEB personnel are aware of procedural requirements to review design output documents when required by design criteria revisions. This training will be completed by April 29, 1988. Unit 1 caps will be installed before entry into mode 4 as required by the updated criteria.

Date When Full Compliance Will Be Achieved

Unit 2 equipment is in full compliance. Unit 1 equipment will be in full compliance before mode 4 entry.

Violation 50-327, -328/87-71-02

"10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Sequoyah administrative instruction (AI)-12, Part II, Adverse Conditions and Corrective Actions, and NEP-9, Corrective Actions, implements this criterion.

Contrary to the above, Condition Adverse to Quality Report CAQR SQN871246, which detailed improper isolation of containment penetration test lines, did not require a generic evaluation or provide justification, even though seven of the same lines are installed at Watts Bar.

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

Admission or Denial of the Alleged Violation

TVA admits the violation.

Reason for the Violation

The inadequate generic review resulted because of a lack of sufficient documentation. When the responsible engineer performed the review, he was well aware of the design changes because he incorporated these changes and knew the design changes were SQN specific. Therefore, the generic review was performed; but the engineer did not document that these instrument sense lines only existed at SQN.

Corrective Steps That Have Been Taken

The situation has been discussed with the responsible engineer, and he is well aware of the documentation requirements.

Corrective Steps That Will Be Taken To Avoid Further Violations

SN was aware that documentation problems existed in the CAQR process. In an effort to define the scope of these problems, Division of Nuclear Quality Assurance conducted internal audits (SQK87802 [T.S.] and SSA-88-807). As a result of these audits and a recent NRC inspection (88-15) conducted during February 8-12, 1988, SN has committed to improve documentation of condition adverse to quality reports (CAQRs). The concerns with the CAQR program identified in this violation will be addressed in the response to Inspection Report 50-327, -328/88-15.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance before unit 2 restart.

Violation 50-327, -328/87-71-03

"Technical Specification (TS) 4.7.1.2.b.1 requires that each automatic valve in the auxiliary feedwater flow path be tested every 18 months to verify proper actuation to the correct position upon receipt of an auxiliary feedwater actuation test signal.

Contrary to the above, surveillance instruction (SI)-118, Revision 14 and earlier revisions which TVA utilized to implement the above TS requirements, did not adequately test the auxiliary feedwater level control bypass valves, in that, the valves were not tested to verify proper operation on receipt of auxiliary feedwater actuation test signals from safety injection, blackout, loss of both main feedwater pumps (MFWP), or trip of 1 MFWP with the plant above 80% power.

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

Admission or Denial of the Alleged Violation

TVA admits the violation.

Reason for the Violation

The initial preparation of SI-118 inadvertently failed to include all combinations of circuit logic testing for the bypass level control valves.

Corrective Steps That Have Been Taken

During the SI review process (initial appendix F to SI-1 review), this discrepancy was identified and corrected by revision 15 to SI-118. As currently written, SI-118 requires testing of all combinations of circuit logic required by TS 4.7.1.2.b.1.

Corrective Steps That Will Be Taken to Avoid Further Violations

There is no further action required.

Date When Full Compliance Will Be Achieved

TVA was in full compliance on April 17, 1987, with the issuance of revision 15 to SI-118.

Violation 50-327, -328/87-71-04

"Technical specification 6.6.1 requires the NRC be notified and/or a report submitted pursuant to the requirements of section 50.73 to 10 CFR Part 50.

10 CFR Part 50, Section 50.73(a)(2)(i)(B) requires that any operation or condition prohibited by the plant's Technical Specifications be reported pursuant to the requirements of 50.73. NUREG 1022 and its supplements provide examples of reportable events that meet the requirements of 50.73(a)(2)(i)(B) which include violation of surveillance requirements.

Contrary to the above, the licensee discovered on March 25, 1987, that surveillance requirement 4.7.1.2.b.1, regarding the auxiliary feedwater level control bypass valves, was not being satisfied and this violation of TS was not reported to the NRC.

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

Admission or Denial of the Alleged Violation

TVA admits the violation.

Reason for the Violation

The incorrect determination of "not reportable" on potential reportable occurrence (PRO) 1-87-129 was a misunderstanding by the evaluator of the operational modes of the auxiliary feedwater bypass level control valves.

Corrective Steps That Have Been Taken

PRO 1-87-434 was initiated on December 3, 1987. This PRO identifies the deficiency in SI-118, revision 14, of not testing the auxiliary feedwater bypass level control valves as required by surveillance requirement 4.7.1.2.b.1. In addition, PRO 1-87-434 identifies the failure to report this condition. Licensee event report (LER) 1-87075 was approved by the Plant Operations Review Committee (PORC) on December 29, 1987, and subsequently submitted to NRC in accordance with reporting requirements. The incident was discussed with the responsible individual on December 22, 1987, to ensure that he is aware of his responsibilities and what actions need to be taken in situations similar to this.

Corrective Steps That Will Be Taken to Avoid Further Violations

There is no further action required.

Date When Full Compliance Will Be Achieved

TVA was in full compliance on December 29, 1987.

ENCLOSURE 2
List of Commitments

1. SQN unit 1 will have caps installed on unit 1 instrumentation sense lines before entry into mode 4.
2. DNE will perform training to ensure EEB personnel are aware of procedural requirements to review design output documents when required by design criteria revisions. This training will be completed by April 29, 1988.