

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

JUL 06 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

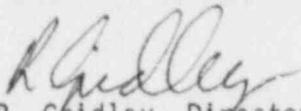
SEQUOYAH NUCLEAR PLANT (SQN) - NUCLEAR REGULATORY COMMISSION (NRC) INSPECTION  
REPORT NOS. 50-327/88-07 AND 50-328/88-07 - RESPONSE TO INSPECTION FOR PIECE  
PARTS PROCUREMENT FOLLOW-UP

Enclosed is TVA's response to S. D. Richardson's letter to S. A. White dated  
April 13, 1988, that requested TVA to respond in writing about how TVA plans  
to ensure, through inspections and inspection documentation, that  
commercial-grade parts are adequately dedicated for use in safety-related  
systems. This response was discussed with George T. Hubbard, of your staff,  
on May 27, 1988.

If you have any questions, please telephone J. D. Ziegler at (615) 751-8077.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
R. Gridley, Director  
Nuclear Licensing and  
Regulatory Affairs

Enclosure  
cc: See page 2

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U.S. Nuclear Regulatory Commission

JUL 06 1988

cc (Enclosure):

Ms. S. C. Black, Assistant Director  
for Projects  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

Mr. F. R. McCoy, Assistant Director  
for Inspection Programs  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Sequoyah Resident Inspector  
Sequoyah Nuclear Plant  
2600 Igou Ferry Road  
Soddy Daisy, Tennessee 37372

## ENCLOSURE

During the inspection, TVA concurred with the NRC position that the licensee should have objective evidence available that demonstrates that critical characteristics have been met and that the critical characteristics identified in dedication packages should be verified for compliance during receipt inspection or verified by other appropriate means and be adequately documented to support the conclusions.

The two basic questions set forth by the NRC inspectors were:

1. Should thread gages, six-inch pocket rules, fillet weld gages, tape measures, etc., be considered controlled and calibrated measuring and test equipment (M&TE); and, if so, why were they not so indicated on the inspection report?
2. Can objective evidence that all dimensional inspections have been made be provided without documenting the actual as-found dimensions "or even a listing of the dimensions to be verified" for each inspection on the inspection report?

TVA's responses to these two basic questions are as follows:

1. The Quality Engineering Materials Unit has previously and will continue to maintain and control devices such as thread gages, weld gages, tape measures, and pocket rules (in addition to the calibrated measuring and test equipment [M&TE]) for use during receipt inspection activities.

These measuring devices, although not considered M&TE (as defined by the Nuclear Quality Assurance Manual), have been provided with identification by type of device. This identification by type will be documented on the inspection report as an enhancement to the existing program.

2. Objective evidence of completion of dimensional inspections required by the dedication package has been provided by the quality control inspector's signoff on the inspection report. To enhance this process, a checklist will be initiated and utilized when five or more measurements are to be inspected on each item. This checklist will provide assurance that each measurement for the more involved inspections has been completed and will be used as support data during review and final signoff of the inspection report. The checklist will be discarded after completion of the inspection report and will not be maintained as a quality assurance record. Any specific measurements that are found to be out of tolerance will continue to be documented on the inspection report.

In addition to the two basic questions presented by the NRC, four other items were identified concerning inspection documentation with respect to dedication packages. These items have been addressed as follows:

3. Documentation shall include the number of items inspected - Provisions have been implemented requiring the number of units inspected for each contract item to be recorded on the inspection report form.
4. Documentation should include inspector criteria (i.e., dimensions with tolerances) - The detailed inspection criteria required to ensure that commercial-grade items are adequately dedicated for use in safety-related systems are documented in the dedication package prepared by the Contract Engineering Group for that item. To comply with this requirement, the inspection report has been revised to require recording the dedication package number and attachment number that documents the dedication inspection criteria (including the dimensions measured) used for the item being received.
5. Documentation should include the inspector's name - The inspector's signature is required on the inspection report form.
6. Documentation should include the status of the item (i.e., acceptable/unacceptable) - Each contract item inspected is recorded on the inspection report form as either satisfactory or unsatisfactory. Unsatisfactory item deficiencies are recorded on the inspection report form. Unsatisfactory items are tagged, segregated, and controlled in accordance with nonconforming item procedures.

As of the date of this letter, all of the procedural enhancements identified in items 1, 2, 3, and 4 are fully implemented. Items 5 and 6 were elements of the original program. In conclusion, our existing program and the enhancements described above should meet or exceed TVA commitments and normal industry practice.