



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON D C 20555

January 6, 1988

NOTE TO: Harold Denton
FROM Frederick Combs
SUBJECT: HENRY MYERS' COMMENTS ON INSPECTION REPORT
50-327/87-31 AND 50-87/87-31

The attached comments were provided to John Bradburne in a telephone discussion with Dr. Myers on December 17.


Fred Combs

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PDR FOIA
CONNORBB-59 PDR

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DR. HENRY MYERS' COMMENTS ON INSPECTION REPORT
50-327/87-31 and 50-328/87-31

The following comments on the subject inspection report on the TVA's Design Baseline and Verification Program (DBVP) for the Sequoyah Nuclear Power Plant were provided by Dr. Henry Myers of the House Interior Committee Staff to Congressional Affairs. The comments are keyed to the indicated sections of the report and its cover letter.

As a general comment, the report declares that problems are resolved without supporting that declaration. Also, the report does not spell out things like DVBP.

- (1) Two qualifications are not spelled out or defined
- (2) Does this sentence say that the NRC approves the report?
- (3) Was the purpose of the inspection achieved? (See page 1 of report, the first two sentences under 2. purpose.)
- (4)
 - 4.1 Operations
 - 4.2 Mechanical Systems
 - 4.3 Mechanical Components
 - 4.4 Nuclear Engineering
 - 4.5 Electric Power
 - 4.6 Instrumentation and Control
 - 4.7 Civil/Structural Engineering
 - See duplicate paragraphs on pages 3 and 4. Is the page 4 paragraph out of order?
 - All of the summary is out of order.
 - Is the paragraph at the top of page 4 talking about all or part of Sequoyah? In essence, are all paragraphs talking about all of Sequoyah or just the particular subject covered?
 - Does "closed" mean satisfactorily handled?

(Page 5) *** Does this mean no deficiencies at all?
- (5) Does this mean they are fixed?
- (6) (page 2) Does this mean "operations of the plant" or "operations of the DBVP?"

(7) (page 6) This is a major item.

(8) (page 7) Problem

(9) (page 8) What is a "non-administrative change?"

(10) (page 8) Do not "implement" a punch list items. You address the problems on the punch list and then solve the problems pointed out by the punch list. Henry believes that the report could be saying that the problems were addressed but not solved.

(11) (page 12) 357 action items and no way to determine if the deficiency is really fixed. Inspection report does not indicate if things are being fixed.

(12) Ask Harold what he thinks of the problems on page 12, 13, 14 and 15 (not all in detail). DBVP did not find them but the EA found them. No indication that problems are being resolved.

(13) (page 15) What is "the project" and is acceptable to do calculations after restart?

(14) (page 16) What are these documents? It would be helpful for a one or two line description on each one.

(15) (page 17) Does this mean that EA only reviewed three punch list items?

(16) General (page 16-17) There is a lack of seismic calculations to confirm assumptions.

(17) (page 17 and 18) Section 4.3.4 is confusing.

(18) (page 25) What problems were reviewed? What did TVA do to resolve them?

(19) (page 25) needs a look

(20) (page 29) Calculation 870223 was the basis for cancelling the variance. Does 86118 mean it was done before 870223? Is this an error-should 86118 be 860118 or is TVA pulling something?

(21) (page 31) The punch list review shows that errors were found. Is this falsifications? Who will confirm a fix here?

(22) (page 31) Disagrees with the last sentence because there is no substantiation of the claims.

(23) (page 31) "As built" verification did not appear in the IDI report on ERC.

Henry says the process is too complicated to be handled by Ebnetter-and certainly too complex to be handled by the Commission. He feels that Sequoyah and TVA are generally worse than Zimmer.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 3 1987

Docket Nos. 50-327
and 50-328

Tennessee Valley Authority
ATTN: Mr. S. A. White
Manager of Nuclear Power
6N 38A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

Gentlemen:

SUBJECT: INSPECTION REPORT NOS. 50-327/87-31 AND 50-328/87-31

This letter forwards the results of a special inspection of TVA's Design Baseline and Verification Program (DBVP) for the Sequoyah Nuclear Power Plant, conducted at the plant site and in your Cedar Bluffs Offices between June 29 and July 24, 1987. The NRC inspection team was comprised of a multi-discipline team of personnel from the Office of Nuclear Reactor Regulation from consulting firms, and from the Region II Office. The team concentrated on the resolution and corrective action for the findings of the DBVP. The team also reviewed the corrective actions resulting from independent oversight of this program by TVA's Engineering Assurance group and evaluated TVA's actions in response to previous NRC design control and DBVP inspection reports. TVA internal reports (1) EA-OR-001, Engineering Assurance Oversight Review Report, "Sequoyah Nuclear Plant - Unit 2 Design Baseline and Verification Program," dated April 29, 1987, and (2) the SQN DBVP Unit 2 Phase I report, dated May 29, 1987, characterize the program, its findings, and the Engineering Assurance oversight effort. These reports were also reviewed during this inspection.

As a result of the inspection, the NRC team concluded that the DBVP was generally conducted in accordance with the program plan. Implementation by both DBVP personnel and the Engineering Assurance oversight group appears to have been adequate in most instances sampled by the inspection team within the scope of the program areas inspected to date.

As noted in the report, implementation of corrective actions for DBVP findings was still in progress at the time of the inspection, as was Engineering Assurance (EA) sampling and verification of implementation. We note that a supplemental report addressing EA oversight of the DBVP has been submitted to the NRC (R. Gridley letter dated October 23, 1987). In order for the NRC to assess the adequacy of the DBVP effort to support plant restart, the supplemental Engineering Assurance Oversight Report remains to be reviewed by the NRC.

Results of the inspection are presented in the enclosure.

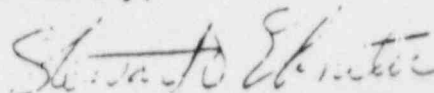
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TVA provided a written response (R. Gridley letter dated October 27, 1987) addressing the observations identified in Appendix A of the enclosed report in advance of the issuing of this report. The substance of these observations had been communicated verbally to TVA during the inspection. An additional NRC inspection (Report 327, 328/87-64) was conducted on October 26-30, 1987. This subsequent inspection addressed many of the open observations addressed in the enclosed report. The NRC's evaluation of your response to this letter will be documented in inspection report 327, 328/87-64. Any observations remaining open at restart will require an evaluation of acceptability for such restart by both TVA and the NRC.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, please contact me or Mr. Gene Imbro, (301) 492-9664.

Sincerely,



Stewart D. Ebnetter, Director
TVA Projects Staff
Office of Special Projects

Enclosure:
Inspection Report 50-327/87-31
and 50-328/87-31

cc w/enclosure:
See next page

Distribution: (w/encl)
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OFC	:NRR:DRIS:SIB	:NRR:DRIS:SIB	:NRR:DRIS:SIB	:DD:DRIS	:D:DRIS	:DD:TVA	:D:TVA
NAME	:REArchitzel	:EYImbro	:CJHaughney	:BKGrimes	:JGPartlow	:SRichardson	:SEbnetter
DATE	:11/5/87	:11/5/87	:11/5/87	:11/6/87	:11/6/87	:11/14/87	:11/14/87

Mr. S. A. White
Tennessee Valley Authority

Sequoyah Nuclear Plant

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Dr. Henry Myers, Science Advisor
Committee on Interior
and Insular Affairs
U.S. House of Representatives
Washington, D.C. 20515

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION

Division of Reactor Inspection and Safeguards

Report Nos.: 50-327/87-31, 50-328/87-31
Docket Nos.: 50-327; 50-328
Licensee: Tennessee Valley Authority
6N, 38A Lookout Place
1101 Market St.
Chattanooga, TN 37402-2801
Facility Name: Sequoyah Nuclear Plant, Units 1 & 2
Inspection At: Cedar Bluffs and Soddy Daisy, TN
Inspection Conducted: June 29-July 2 and July 20-24, 1987
Inspection Team Members:
Team Leader: R. E. Architzel, Senior Operations Engineer, NRR
Mechanical Systems: F. J. Mollerus, Consultant, Mollerus Engineering Inc.
Nuclear Engineering: J. A. Nevshemal, Consultant*
Mechanical Components: A. V. du Bouchet, Consultant
Civil/Structural: A. I. Unsal, Consultant, Harstead Engineering
Electrical Power: S. V. Athavale, Electrical Engineer, NRR*
Instrumentation & Control: L. E. Stanley, Consultant, Zytor Inc.
Operations: P. E. Harmon, Resident Inspector, Sequoyah
H. E. Bibb, Resident Inspector, St. Lucie NPP*

Ralph E. Architzel 10/9/87

Ralph E. Architzel Date
Team Leader

E. V. Imbro 10/18/87

Eugene V. Imbro Date
Section Chief
Team Inspection Appraisal and Development Section #2
Special Inspection Branch

~~87-2790287~~
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*6/29-7/2/87 only

LIST OF ABBREVIATIONS

ABGTS	auxiliary building gas treatment system
AFW	auxiliary feedwater
CAQ	condition adverse to quality
CAQR	condition adverse to quality report
CCP	centrifugal charging pump
CCRIS	Calculation Cross Reference Information System
CCS	component cooling water system
CEB	Civil Engineering Branch
CFR	Code of Federal Regulations
DBVP	Design Baseline and Verification Program
DCR	design change request
DES	Discipline Evaluation Supervisor
DIM	design input memorandum
DNE	Division of Nuclear Engineering
EA	Engineering Assurance
ECCS	emergency core cooling system
ECN	engineering change notice
EEB	Electrical Engineering Branch
ERCW	essential raw cooling water system
FCN	field change notice (Westinghouse)
FCR	field change request
FSAR	Final Safety Analysis Report
HPFP	high-pressure fire protection
HVAC	heating, ventilation, and air conditioning
I&C	instrumentation and control
IEEE	Institute of Electrical and Electronics Engineers
LDCR	local design change request
LOCA	loss of coolant accident
MEB	Mechanical Engineering Branch
MI	maintenance instruction
NCR	nonconformance report
NEB	Nuclear Engineering Branch
NPSH	net positive suction head
NRC	Nuclear Regulatory Commission
NSSS	nuclear steam supply system
OR	oversight review
PGCE	potential generic condition evaluation
PIR	problem identification report
PL	punchlist

QIR	quality information report
RCS	reactor coolant system
RHR	residual heat removal
RIMS	records information management system
SCR	significant condition report
SE	System Engineer
SI	surveillance instruction
SQR	Static-O-Ring
SQEP	Sequoyah Engineering Procedure
SN	Sequoyah Nuclear Plant
SSE	safe shutdown earthquake
SWBID	system walkdown boundary identification drawing
SYSTEM	System Evaluation Report
TACF	temporary alteration control form
TVA	Tennessee Valley Authority
USQD	unreviewed safety question determination
WDP	walkdown package
WP	work package
WR	work request
ZPA	zero period acceleration