

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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JUL 06 1988

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

Dear Ms. Black:

In the Matter of
Tennessee Valley Authority

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Docket Nos. 50-327
50-328

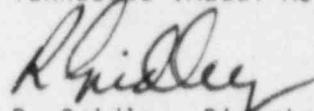
EMPLOYEE CONCERNS TASK GROUP (ECTG)

The TVA ECTG has reviewed the preliminary Safety Evaluations for Sequoyah element reports which G. G. Zech sent to Mr. White in a letter dated March 11, 1988. I am forwarding the results of the ECTG's review in enclosure 1. We have held discussions with regard to this matter with Jack Donohue, and other members of your staff. Summary statements of commitments contained in this submittal are provided in enclosure 2.

Contact R. F. Campbell at (615) 751-4892 should you require additional information.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

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U. S. Nuclear Regulatory Commission

JUL 06 1988

cc (Enclosures):

Mr. F. R. McCoy, Assistant Director
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Enclosure 1

ENCLOSURE 1

ECTG COMMENTS ON NRC PRELIMINARY
Safety Evaluation Report (SER) DATED MARCH 11, 1988

SER for Engineering Element Reports

TVA Comment: NRC prepared one SER dealing with engineering issues of a programmatic nature - primarily, organizational and/or procedural problems in the engineering design process. This SER encompasses the following 11 element reports: 20104, 20105, 20106, 20303, 20401, 20402, 20403, 20404, 20405, 20702, and 20704.

On page two of this SER in the Conclusion Section, the following statement is made: "Any additional program changes should be submitted for staff review and should not be implemented prior to review and approval by the staff." This statement also appears on page two of Element Report 21510.

TVA has established a program for monitoring implementation of Sequoyah Corrective Action Plans (CAP) developed in response to findings by the Employee Concerns Special Program. This program will review any changes to the original CAPs and will ensure that any such changes are consistent with the original objectives.

In reviewing these changes to CAPs, any significant change to the intent of the CAP will be submitted to NRC for review and approval by the staff prior to implementation. Other changes will be implemented and the staff will be notified subsequently in the form of a yearly summary report which will describe associated changes made in corrective action plans for each site.

Enclosure 1, Table 2 (page 4) -

NRC states that concern PH-85-003-003, "Wire Terminations," was not explicitly addressed by TVA in their element reports.

TVA Comment: Concern PH-85-003-003 is addressed in Element Report 21102.

Enclosure 1, Table 2, (page 4) -

NRC states that Concern XX-85-093-004, "Gassing of Current Transformers," was not explicitly addressed by TVA in their element reports.

TVA Comment: Concern XX-85-093-004 does not exist in the Quality Technology Company (QTC) files expurgated by NRC and sent to the Employee Concerns Task Group (ECTG). Concerns XX-85-060-001 through XX-85-093-003 were generated by QTC from the concern files. WI-85-060-N02 was generated by NRC to address the current transformer issue which was omitted by QTC. This issue and concern WI-85-060-N02 are addressed by Engineering Element Report 23706 and Subcategory 26500.

Construction Element Report 11305, "Anchors Cut Off As Related To Construction"

The SER for this element report states that NRC concurs with conclusions presented in the contractor's Technical Evaluation Report, one of which was that four of the employee concerns (considered as non-restart) have not been directly addressed by the Sequoyah element report. The SER conclusions state that the staff will perform additional review of TVA's resolution to assure that all concerns have been adequately addressed.

The four concerns considered by the contractor not to be addressed are as follows:

- a) Cut off shells or insufficient plug depth
- b) Anchors welded to rebar
- c) Nuts welded to the back of base plates
- d) Abandoned holes grouted with red head left in place

TVA Comment: These concerns were Watts Bar-specific concerns that ECTG made generic to Sequoyah as the ECTG was addressing the general issues identified for all 27 concerns in the element report. The sampling programs used at Sequoyah to address the general anchorage issues also considered the more detailed issues within the above four concerns. The methods in which the evaluations for anchorage issues were conducted for Watts Bar and Sequoyah were addressed in Subcategory Report 11300, "Anchorages." Sequoyah Element Report 11305, in conjunction with Subcategory Report 11300, adequately address anchorage issues raised by concerns in the element report.

Welder Qualification/Training

In discussing Element Report WP-24-SQN, the SER notes in the last paragraph on Page 9 and the first paragraph on Page 10 that there is a secondary issue of other welders who were qualified in the same way (transfer of qualification from another TVA organization to Sequoyah) for whom TVA had not conducted investigations to demonstrate adequacy. NRC notes that this item was identified for corrective action in the final element report, but was not closed by TVA. The staff requests that this item be brought to closure. In the Conclusion Section on page 11, NRC notes that there is one open item in which the licensee should establish that all welders transferring from other TVA facilities to SQN did meet code requirements for welding performance qualification.

TVA Comment: On page 3 of Element Report WP-03-SQN, information is provided regarding action which TVA has already taken to address this item. Sequoyah Nuclear Operations has completed a review of all welders whose qualifications were transferred from other sites. Lapses of continuity have been identified, and corrective actions have been taken. Sequoyah welders who have transferred qualifications have successfully passed a requalification test administered at Sequoyah to provide for welder performance qualification continuity. The applicable procedure has also been revised to provide a positive method of welder performance qualification continuity.

Welding Inspection

TVA has several comments to make regarding the last paragraph on page 12 in this SER. The paragraph provides a discussion of TVA's practice of having welder foremen perform fit-up inspections.

The second sentence in this paragraph states the following with respect to TVA's fit-up inspection practice: "This is a case of TVA taking exceptions, interpretations, or unusual approaches to meeting the requirements of ANSI N45.2.5 without requesting an approval from the NRC for the exception." It is TVA's understanding that this sentence is not a conclusion reached by NRC but is rather a restatement of allegations in the employee concerns. It is also TVA's understanding that the sentence will be revised to clarify this point.

The third sentence in this paragraph states the following: "For safety-related structures, we would probably require the structures to be inspected for fit-up, and that these inspections be performed by a QC inspector." TVA's position on this statement is that it is outside of industry code requirements. A detailed historical background of TVA's position on the fit-up issue, dating back to a 1980 audit finding by TVA at Bellefonte Nuclear Plant, is presented in Element Reports WP-16-BLN and WP-16-WBN. In a 10 CFR 50.55(e) evaluation on the audit finding, TVA determined that an inprocess (surveillance) inspection by Quality Control satisfies the requirements of applicable industry codes and standards. TVA continues to maintain this position and requests that the sentence quoted above be deleted from the SER. This issue had been resolved in the past between TVA welding project and the NRC staff.

Engineering Element Reports

20101 - On pages 2 and 3, the SER discusses the issue of management's attitude toward safety regulation.

TVA Comment: The issue regarding management's attitude toward safety regulation is addressed in Management and Personnel (M&P) Report 70600.

20103 - On pages 1 and 4, the SER discusses an issue on solenoid valve closing time at WBN.

TVA Comment: This issue has not been addressed because it was not identified as a concern by QTC or in the NRC expurgated files. Also, in the last paragraph on page 3, SQN Element Report 231.3 should read 213.3.

20105 - On pages 1 and 2, the SER states that the issue is "Inadequate tracking of commitments and design changes."

TVA Comment: Element 20105 addresses only the tracking of commitments. Element 20406 addresses tracking of design changes.

20405(B)- SER was written based on Revision 0 dated November 25, 1986.

TVA Comment: Revision 2 of 20405 was issued December 14, 1987, and transmitted to NRC on December 17, 1987.

20405(B)- Page 3 indicates that the TVA corrective action will be tracked as part of NRC's overview of the IDI.

TVA Comment: This is not reflected in Table 3 of Enclosure 1 to NRC's cover letter.

20406 - On page 2, concern I-85-128-NPS is indicated as having been written by a Bellefonte Nuclear Plant employee.

TVA Comment: This concern was written by a Browns Ferry Nuclear Plant employee.

20409 - The SER is written based on Revision 0 of the non-restart justification summary submitted January 15, 1987.

TVA Comment: Revision 0 of the element report was issued October 14, 1987, and was transmitted to NRC on October 16, 1987.

20902 - On page 1, Section I indicates this SER is for 209.1(B).

TVA Comment: This SER is for 209.2(B).

220.01 - On Page 2, second paragraph, the NRC states that their review of the SQN drawings did not identify any problems, while the conclusion in Section IV states that the Element Report did not thoroughly evaluate the employee concern and that the employee concern is substantiated.

TVA Comment: The NRC's basis for stating that the concern is substantiated is the Watts Bar review performed by the NRC, which TVA Subcategory Report 22000 concurs with. However, the TVA evaluation did not reveal a problem at Sequoyah for two of the three issues evaluated, and therefore no additional discussion was necessary.

231.1, 231.4, and 231.5 - These SERs indicate that TVA should revise the element reports to address additional items identified in the SER.

TVA Comment: Rather than revise these element reports, TVA would prefer to revise subcategory report 23100 to address the concerns identified in the SERs. This will assure that the concerns are adequately addressed for all TVA plants.

Material Control Element Reports

40301 - Page 1, third paragraph, states in part, "The remainder of the concern is addressed in Material Control Subcategories, Purchasing and Requisitioning (MC 40200) and Material Identification (MC 40500). . . ."

TVA Comment: Remove "Purchasing and Requisitioning (MC-40200) and" from last sentence of third paragraph. Concern EX-85-181-001 was removed from Subcategory 40200 after issuance of Element Report MC-40301-SQN.

40307 - SER was written based on Revision 2 of Element Report MC 40307-SQN, dated October 31, 1986.

TVA Comment Concern IN-85-339-003 was added to revision 3 of this element report which was dated March 27, 1987. Neither the results nor the conclusions were affected by this change. The SER reflects the information and concerns listed in a prior revision of this report (revision 2).

40705(A)- SER was written based on Revision 1 of Element Report MC 40705-SQN, dated October 31, 1986.

TVA Comment: Based on additional information found in an NSRS report, further evaluation was performed concerning the programmatic aspects of the Heat Number Validation process. This resulted in the issuance of CATD 40705-SQN-01 and in the issuance of revision 4 of this element report on September 2, 1987. The SER is based on a review of a prior revision of this report (revision 1).

40705(B)- SER states that "this concern was evaluated by TVA as potentially nuclear safety-related, and only relevant to Sequoyah."

TVA Comment: This concern was evaluated at Watts Bar and Sequoyah.

ENCLOSURE 2

ENCLOSURE 2

Summary Statements of Commitments

1. Review changes to the original CAPs and ensure that any such changes are consistent with the original objectives.
2. Submit significant changes to the intent of CAPs to NRC for review and approval.
3. Submit a yearly summary report describing the changes made in corrective action plans for each site.