

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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APR 13 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. 50-327/87-78 AND  
50-328/87-78 - RESPONSE TO NOTICE OF VIOLATIONS

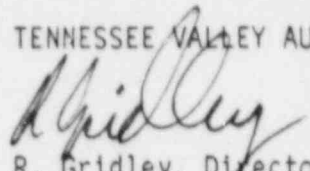
Enclosed is my response to K. P. Barr's letter to S. A. White dated  
March 14, 1988, that transmitted Notice of Violations 50-327, -328/87-78-01  
and -02.

Enclosure 1 provides my response to the Notice of Violation. Enclosure 2  
contains a list of commitments contained in this submittal.

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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U.S. Nuclear Regulatory Commission

APR 13 1988

cc (Enclosures):

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ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT NOS.  
50-327/87-78 AND 50-328/87-78  
K. P. BARR'S LETTER TO S. A. WHITE  
DATED MARCH 14, 1988

Violation 50-327, -328/87-78-01

"Technical Specification (TS) 6.8.1 requires that procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Rev. 2, be established, implemented, and maintained. This includes administrative procedures. The requirements of TS 6.8.1 as implemented by Administrative Instruction (AI)-30, Section 23 'Plant Staff Overtime Limits' requires Plant Manager or Plant Superintendent authorization to exceed the overtime limits specified in AI-30. AI-30 also requires that AI-2, Appendix C, 'Deviation From Plant Staff Overtime Limits' be forwarded to the Plant Manager no later than the next work day.

Contrary to the above, from February to November, 1987, the overtime limits specified in AI-30 were exceeded on numerous occasions without Plant Manager or Plant Superintendent authorization. In addition, the form documenting deviation from plant staff overtime limits was not always forwarded to the Plant Manager within the required time period.

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

Admission or Denial of the Alleged Violation

TVA admits a violation occurred.

Because procedural information was either not supplied or properly communicated during the inspection, the following clarifications should be noted:

The examples referenced in Inspection Report 87-78 (February to November 1987) relate to lack of compliance with AI-2 requirements instead of AI-30 because overtime limits were not placed in AI-30 until January 5, 1988 by revision 10. This revision to AI-30 may have resulted in some confusion because the inspection was conducted December 14-18, 1987, and February 2-4, 1988.

During the period discussed in this violation, the overtime limits were specified in AI-2. AI-2 allowed an individual's supervisor to authorize overtime in excess of specified limits and forward AI-2, attachment C, to the Plant Manager no later than the next regular work day. The exception to this was work in excess of 16 hours. Work in excess of 16 hours required before Plant Manager or Plant Superintendent approval.

Reason for the Violation

The root cause of this violation was lack of management attention to the requirements of AI-2, "Authorities and Responsibilities for Safe Operation and Shutdown," regarding approval of personnel to exceed prescribed overtime

limits. Contrary to the requirements of AI-2, excessive time elapsed between the day of overtime authorization and Plant Manager notification. In addition, AI-2 and AI-30 (revision 10) did not meet the intent of Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," which is to obtain prior approval of overtime in excess of the prescribed limits from a high level of plant management.

Corrective Steps That Have Been Taken

AI-30 has been revised to require prior verbal approval from the Plant Manager or his deputy (as prescribed by the SQN monthly management duty roster) for overtime in excess of prescribed limits. This approval will be documented on the associated AI-30 attachment, and a copy of the attachment will be forwarded to the Operations superintendent.

The requirement to forward AI-30, attachment E, to the Plant Manager within the next working day has been deleted based on his prior verbal approval. The overtime requirements described in AI-2 have also been deleted to avoid potential confusion and duplication.

Corrective Steps That Will Be Taken to Avoid Further Violations

In addition to the corrective actions that have already been accomplished, the Plant Manager is stressing to all plant management the importance of reducing the need for personnel to work in excess of the overtime limits of AI-30.

No further corrective action is considered necessary.

Date When Full Compliance Will Be Achieved

SQN is in full compliance.

Violation 50-327, -328/87-78-02

"10 CFR 50, Appendix B, Criterion V, the licensee's accepted Quality Assurance Program, and the Nuclear Quality Assurance Manual collectively require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with instructions, procedures, or drawings.

Contrary to the above prior to December 14, 1987, the licensee failed to prescribe in instructions or procedures the training and qualification requirements for composite crews, in that composite crews were implemented prior to having established training and qualification requirements for foremen and general foremen supervising personnel in other crafts, for craftsmen performing work outside of their craft, and for craftsmen performing independent verification outside of their craft.

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

Admission or Denial of the Alleged Violation

TVA admits the violation.

Reason for the Violation

This violation resulted from a management decision to implement composite maintenance crews without fully assessing the personnel qualification requirements contained in the following: (1) the Nuclear Quality Assurance Manual (NQAM), Part III, section 6.1, for craft general foremen, foremen, and the personnel they supervise; (2) the requirements contained in AI-37, "Independent Verification"; and (3) the commitment to American National Standards Institute (ANSI) 18.1-1971 contained in TVA topical report TVA TR75-1A.

Corrective Steps That Have Been Taken

SQN Standard Practice SQM-70, "Composite Crew Operation," has been created to specify requirements for assignment of work to composite crews and for independent verifications performed by personnel assigned to the crew. SQM-70 also ensures that only persons qualified and trained to perform a particular job are assigned to do the job (i.e., electricians performing electrical tasks, mechanics performing mechanical tasks, etc.). These individuals may be assisted by persons who have expertise in a different craft, but those assisting will not perform any task for which they have not been specifically qualified and trained to perform.

An NQAM quality notice has been issued clarifying the requirements for foremen supervising composite crews. Before issuance of this notice, a review of TVA's commitment to ANSI 18.1-1971 was performed. The results of the review determined that the quality notice did not constitute a reduction in commitment to the ANSI standard. The notice states, "Foremen of multiple discipline crews shall have four or more years of experience in one of the crew disciplines and direct access to technical support in other disciplines."

Corrective Steps That Will Be Taken to Avoid Further Violations

AI-37 will be revised by June 15, 1988, to clarify the requirements for independent verification. These requirements ensure that personnel performing independent verification are qualified to perform the work.

A TVA standard on composite crew operation is being developed that will define requirements for all TVA nuclear plant sites and will address the qualifications, experience, and training requirements for composite crews and their craft supervision. SQN procedures will be changed as necessary to reflect the proper implementation of the standard. The standard on composite crews will be issued by September 1, 1988. Implementation will be complete by December 1, 1988.

Date When Full Compliance Will Be Achieved

SQN was in full compliance following the issuance of the NQAM quality notice and SQM-70.

ENCLOSURE 2

List of Commitments

1. SQN will revise AI-37 to clarify requirements for independent verification by June 15, 1988.
2. The TVA standard on composite crews will be issued by September 1, 1988.
3. SQN procedures will be changed as necessary to reflect proper implementation of the TVA standard on composite crews by December 1, 1988.