

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

AUG 25 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. 50-327/88-02,  
50-328/88-02 - REVISED RESPONSE TO NOTICE OF VIOLATION

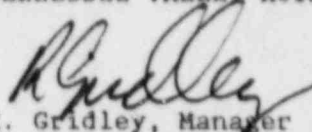
Enclosed is TVA's revised response to F. R. McCoy's letter to S. A. White dated February 25, 1988, that transmitted Notice of Violation 50-327/88-02-01 and 50-328/88-02-01. This response is being initiated as a result of questions asked by the resident inspector regarding the response dated March 29, 1988.

Enclosure 1 provides TVA's response to the notice of violation, example 3. Summary statements of commitments contained in this submittal are provided in enclosure 2.

If you have any questions, please telephone M. A. Cooper at (615) 870-6549.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
R. Gridley, Manager  
Nuclear Licensing and  
Regulatory Affairs

Enclosures  
cc: See page 2

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U.S. Nuclear Regulatory Commission

AUG 25 1988

cc (Enclosures):

Ms. S. C. Black, Assistant Director  
for Projects  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
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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 37379

ENCLOSURE 1

Violation 50-327, -328/88-02-01

\* \* \*

"Administrative Instruction (AI)-25, (Part I), Rev. 23, 'Drawing Control After Licensing,' requires that controlled copies, date stamped copies, work plan copies or best available vendor drawing copies be used to perform work."

\* \* \*

"Contrary to the above,"

\* \* \*

"3. On January 31, 1988, a portion of an unidentified drawing marked 'Information Only' was used to perform work on containment spray system flow indicator 2-FI-72-34."

\* \* \*

Admission or Denial of the Alleged Violation

TVA admits the violation.

Reason for the Violation

As stated in TVA's response dated March 29, 1988, "On January 31, 1988, maintenance work was performed on the containment spray pump 2A flow loop 2-F-72-34. The work to be performed consisted of backfilling the low-side sense line of 2-FM-72-34A, 2-FM-72-34B, and 2-FI-72-34 in accordance with SI-203."

As a result of the NRC resident inspector's questions, TVA has conducted an additional investigation into this incident. TVA could not determine whether physical work had been performed using information-only drawings. This investigation did reveal that AI-25 could be a contributing factor with an incident of this type in that it could be misconstrued. However, because no objective evidence can be established regarding this situation and because TVA fully agrees with the technical merits regarding use of drawings, TVA does not take issue with the violation.

Corrective Steps That Have Been Taken

Condition Adverse to Quality Report (CAQR) SQN880159 has been issued to document and track corrective actions taken. The incident has been discussed with the employees involved, and they are aware of the procedural requirement to use only controlled drawings or controlled prints. Instrument Maintenance has conducted training classes with instrument mechanics to reinforce the requirements described in AI-25. TVA has stressed the importance of using controlled drawings for performing work. TVA continues to reinforce the proper use of controlled drawings during periodic training sessions.

Corrective Steps That Will Be Taken to Avoid Further Violations

AI-25 will be revised by October 15, 1988, to provide more specific direction for control of drawings used during performance of work.

Date When Full Compliance Will Be Achieved

TVA is in full compliance.

ENCLOSURE 2

List of Commitments

1. AI-25 will be revised by October 15, 1988, to provide more specific direction for control of drawings used during performance of work.