

AUG 30 1988

Official

Docket Nos. 50-327, 50-328
License Nos. DPR-77, DPR-79

Tennessee Valley Authority
ATTN: Mr. S. A. White
Senior Vice President,
Nuclear Power

6N 38A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-327/88-20 AND 50-328/88-20

Thank you for your response of July 5, 1988, to our Notice of Violation issued on June 3, 1988, concerning activities conducted at your Sequoyah facility. We have evaluated your response and found that it meets the requirements of 10 CFR 2.201.

With respect to corrections and clarifications associated with admission of violation 1a, we acknowledge that the original violation incorrectly stated that centrifugal charging (CC) pump 2BB was in the "pull-to-lock" position. This statement appeared in the notice of violation as a result of an error in editorial review. Regardless of the editorial review error, the actual assumption that the 2BB CC pump was not OPERABLE in accordance the unit's Technical Specifications is still correct and the characterization of the notice of violation is unchanged.

With respect to the additional information supplied in response to violation 1b, you stated that the event was conservatively reported as a four hour notification under the 10CFR 50.72.b.1.iii rule and that, according to NUREG-1022, Supplement 1, question 7.8, unrelated independent failures that did not actually occur should not be included in the evaluation if an event or condition is reportable under this rule. As stated above the 2BB CC pump was not OPERABLE in accordance with the unit's Technical Specifications because a post maintenance test had not yet been performed and the 2AA CC pump was in the "pull-to-lock" position. Therefore, at the time, no objective evidence was present that either pump could have performed its intended safety function.

With respect to your statement that the 2BB CC pump would have operated automatically if an engineered safety function actuation had occurred, there was no objective evidence prior to the performance of the post maintenance test that the 2BB CC pump would have automatically performed within the Technical Specification required acceptance limitations, regardless of the fact that the pump was being used to pump water during this event.

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Tennessee Valley Authority

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We will examine the implementation of your corrective actions during future inspections.

Sincerely,

Original Signed by
Steven D. Richardson

Steven D. Richardson, Director
TVA Projects Division,
Office of Special Projects

cc: ✓ A. Kirkebo, Vice President,
Nuclear Engineering
✓ L. LaPoint, Acting Site Director
Sequoyah Nuclear Plant
✓ L. Gridley, Director
Nuclear Safety and Licensing
✓ W. Harding, Site Licensing
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bcc: ✓ G. Partlow, OSP
✓ S. G. Richardson, OSP
✓ S. Black, OSP
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F. R. McCoy, OSP/RII
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NRC Resident Inspector
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