TENNESSEE VALLEY AUTHORITY
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SEP 28 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) UNITS 1 AND 2 - NRC INSPECTION REPORT NOS. 50-327, 328/88-33 - RESPONSE TO NOTICE OF VIOLATION (NOV) 50-327, 328/88-33-01

Enclosed is TVA's response to F. R. McCoy's letter to S. A. White dated August 22, 1988, that transmitted the subject NOV.

Enclosure 1 provides TVA's response to the NOV. 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

SEP 28 1988

Enclosures
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Enclosure 1

Response to NRC Inspection Report
No. 50-327, 328/88-33
F. R. McCoy's Letter to S. A. White
Dated August 22, 1988

Violation 50-327, 328/88-33-01

"Technical Specification 6.8.1.e stated that, 'Written procedures shall be established, implemented, and maintained covering .... Site Radiological Emergency Plan [REP] implementation.'

REP Implementing Procedure IP-1, 'Emergency Plan Classification Logic,' stated, 'If there is any reason to doubt whether a given condition has actually occurred, the shift engineer or Site Emergency Director will proceed with the required notification without waiting for formal confirmation.'

Contrary to the above, on February 8, 1988, although there may have been reason to doubt the validity of a seismic alarm at time of receipt, the licensee failed to implement the REP until 64 minutes after the conditions had been met for declaring a Notification of Unusual Event.

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

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

IP-1 is intended to provide logic for determining whether the REP should be activated and, if it is activated, at what level it should be classified. As stated in the Purpose section of IP-1, it ". . . guides the Shift Engineer (SE) or Site Emergency Director (SED) in determining the class of an accident based on plant conditions." Section 3 of that procedure states, "The Shift Engineer is responsible for declaring the emergency and providing the initial activation of the REP," and that the logic procedure ". . . should be combined with the sound judgement of the Shift Engineer and/or the Site Emergency Director to arrive at a classification for a particular set of circumstances." In other words, activation of the REP is to be based on the guidance in IP-1 and on the training, experience, and knowledge of the SE. A copy of page 1 of IP-1 is enclosed.

In an effort to provide the SE/SED latitude in classifying the event (based on his training, experience, and knowledge), the procedure inadvertently imposes conflicting requirements for activating the REP in the event of suspected false or spurious alarms. In this particular event, the SE was certain the seismic alarm actuated was of a spurious nature and relied upon his previous experience with seismic activity at SQN, knowledge of work activity in the area, and the latitude provided in IP-1 to not classify the event and not initiate the REP. As recorded in the SE's log, employees were dispatched to the plant at the time the spurious alarm was received to determine the cause of the spurious alarm, not its validity.

However, after further consulting the general instructions (section 3.0) of IP-1, the SE made a conservative decision to declare a Notification of Unusual Event (NOUE) to ensure that the requirements of IP-1 were not violated. This latter determination was made approximately one hour following initial receipt of the alarm. Subsequently, the appropriate notifications were made (NOUE was declared at 1:13 p.m. and NRC was notified at 1:15 p.m.).

Corrective Steps That Have Been Taken and Results Achieved

SQN has reviewed IP-1 to evaluate the events of February 8, 1988, and has identified that a potential for confusion exists in section 3.0 of IP-1 with regard to known or suspected spurious alarms.

Corrective Steps That Will Be Taken to Avoid Further Violations

To prevent recurrence of this violation, SQN will review and revise IP-1 to clarify the requirements for initiation of the REP. IP-1 will be revised to direct the SE/SED to follow his indications; and, unless a suspected spurious or otherwise false alarm can be substantiated within a minimum timeframe (based on the potential severity of the event), he is to proceed with actions as required by IP-1 until such time as the alarm is verified to be false.

Date When Full Compliance Will Be Achieved

SQN will review and revise IP-1 by October 31, 1988.

EMERGENCY PLAN CLASSIFICATION LOGIC

1.0 PURPOSE

This procedure guides the Shift Engineer (SE) or Site Emergency Director (SED) in determining the class of an accident based on plant conditions.

2.0 REFERENCES

2.1 SQN Radiological Emergency Plan

2.2 NUREG - 0654 "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans & Preparedness in Support of Nuclear Power Plants"

2.3 Bases for Radiological Effluents/Releases or Radiation Monitor Readings:

(1) J. T. Dills, Jr. to T. H. Youngblood memo dated 8/14/86 (S53 860815 941)

(2) M. S. Robinson's memo dated 10/28/85 (L61 851028 805)

3.0 GENERAL

The TVA Radiological Emergency Plan (REP) will be activated when any one of the conditions listed in this logic is detected. The Shift Engineer is responsible for declaring the emergency and providing the initial activation of the REP.

To determine the classification of the emergency, enter the logic with the known or suspected conditions and carry out the notification referenced. If there is any reason to doubt whether a given condition has actually occurred, the shift engineer or Site Emergency Director will proceed with the required notification without waiting for formal confirmation. If followup investigations show that a suspected condition has not occurred, is less severe, or more severe than originally suspected, the classification will be cancelled, downgraded, or upgraded as required. The highest classification for which an emergency action level currently exists shall be declared. If an emergency action level for a higher classification was exceeded but the present situation indicates a lower classification, or if the emergency situation has been resolved, the fact that the higher classification occurred shall be reported to the NRC and CECC, but should not be declared.

The following actions are given for guidance only: knowledge of actual plant conditions or the extent of the emergency may require that additional steps be taken. In all cases, this logic procedure should be combined with the sound judgement of the Shift Engineer and/or the Site Emergency Director to arrive at a classification for a particular set of circumstances.

Enclosure 2

List of Commitments

1. SQN will review and revise IP-1 by October 31, 1988, to clarify the requirements for initiation of the REP. IP-1 will be revised to direct the SE/SED to follow his indications; and, unless a suspected spurious or otherwise false alarm can be substantiated within a minimum timeframe (based on the potential severity of the event), he is to proceed with actions as required by IP-1 until such time as the alarm is verified to be false.