

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

JUN 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 - REVISED RESPONSE TO NOTICE OF VIOLATION

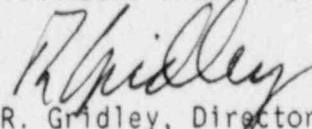
Enclosed is my response to K. P. Barr's letter to S. A. White dated
May 10, 1988, that requested a supplemental response to violation
50-327, -328/87-78-02.

Enclosure 1 provides my revised response to this violation. Enclosure 2
contains a list of commitments contained in this submittal. This list of
commitments supersedes commitments identified in our previous response to
violation 50-327, -328/87-78-02.

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

JUN 13 1988

cc (Enclosures):

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for Inspection Programs
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ENCLOSURE 1

REVISED RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327/87-78 AND 50-328/87-78
K. P. BARR'S LETTERS TO S. A. WHITE
DATED MARCH 14, 1988, AND May 10, 1988

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 foreman 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 Administrative Instruction (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

SNQ 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. 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. 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."

Composite crews performing multiple-discipline work on safety-related equipment and features include lead craftsmen for each required discipline other than that of the crew foreman. The lead craftsmen possess a high school diploma or equivalent, have four or more years of experience in their craft, and therefore meet the requirements for foremen as specified in ANSI 18.1-1971. The lead craftsmen provide assistance in selecting individuals for work assignments within their craft discipline.

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.

Equivalency training similar to the cross-discipline training given to the MOVATS composite crew will be developed for existing composite crews. Equivalency training will also be developed as additional composite crews are created. This cross-discipline equivalency training, along with possession of a high school diploma or equivalent and the requirements stated in the quality notice, constitutes an acceptable method of meeting the experience requirements of ANSI 18.1-1971 for composite crew foremen.

Until equivalency training is developed and implemented for a particular composite crew, lead craftsmen will be assigned to composite crew foremen as previously described in this enclosure.

The NQAM quality notice for SQN will be revised to include discussion on equivalency training for multiple-discipline crew foremen by July 8, 1988.

SQM-70 will be revised to require completion of identified equivalency training for composite crew foremen or assignment of lead craftsmen for craft disciplines outside that of the particular composite crew foremen before allowing a composite crew to perform any work on safety-related equipment or features. The instruction will be revised by July 8, 1988.

Date When Full Compliance Will Be Achieved

SQN is in full compliance.

ENCLOSURE 2

List of Commitments

1. SQN will revise AI-37 to clarify requirements for independent verification by June 15, 1988.
2. NQAM quality notice for SQN on qualifications for multiple-discipline crew foremen will be revised to include discussion of equivalency training requirements by July 8, 1988.
3. SQM-70 will be revised by July 8, 1988, to require completion of identified equivalency training for composite crew foremen or assignment of lead craftsmen for craft disciplines outside that of the particular composite crew foremen before allowing a composite crew to perform any work on safety-related equipment or features.