

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
5N 157B Lookout Place

JUN 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. 50-327/87-30, 50-328/87-30 - USE OF AUXILIARY VERBS IN PLANT DOCUMENTS

- References:
1. Letter from R. Gridley to NRC dated November 10, 1987, "Sequoyah Nuclear Plant (SQN) Units 1 and 2 - NRC Inspection Report No. 50-327, -328/87-30 - Revised Response to Notice of Violation (NOV) 50-327, -328/87-30-02 and 50-327, -328/87-30-07"
  2. Letter from F. R. McCoy to S. A. White dated February 25, 1988, "Notice of Violation (NRC Inspection Report Nos. 50-327/88-02 and 50-328/88-02)"
  3. Letter from S. D. Richardson to S. A. White dated May 16, 1988, "Report Nos. 50-327/87-30 and 50-328/87-30"

In reference 1, TVA denied example 2 of violation 50-327, -328/87-30-07. The denial was based on the fact that the particular step of Surveillance Instruction (SI) 196 not followed used the word should, which indicates a recommendation rather than a requirement. A conscious decision had been made by personnel performing the SI that the step in question did not need to be performed. As a result of NRC concerns regarding test activities, a procedure, Administrative Instruction (AI) 47, "Conduct of Testing," was written to specifically address test activities and as an enhancement specifies that, if steps containing the word should are omitted, documentation of the basis for omitting the step is required in the test package. TVA's response was evaluated by NRC; violation 50-327, -328/87-30-07 was closed by reference 2; and NRC further addressed acceptance of the denial in reference 3. However, in reference 3 NRC additionally questioned why TVA has limited this enhancement to test instructions and requested that TVA address how it intends to treat the word should in other plant documents (instructions, procedures, workplans, etc.). As such, we are providing the following information.

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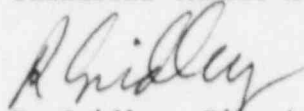
American National Standard Institute (ANSI) Standard N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," defines shall as denoting a requirement and should as denoting a recommendation. These same definitions are specified in TVA's Nuclear Quality Assurance Manual and are utilized in quality affecting procedures, which are developed in accordance with ANSI N18.7-1976. Instructions and procedures are prepared with sufficient detail for a qualified individual to perform the required function. This detail includes those steps that shall be followed for prerequisites, precautions, and performances. The word should is used to define those actions that ought to be taken to better facilitate procedure performance; however, steps utilizing this auxiliary verb could be omitted without affecting the safe operation of the plant. The evaluation of the need to follow a should statement is within the ability of the qualified individual utilizing the document.

The inclusion in AI-47 of a requirement for documenting the basis for not performing should steps is an enhancement, which was incorporated into the AI as part of a general test activities upgrade effort being implemented at that time. Information regarding this action was provided in previous TVA response to address specific NRC concerns regarding test activities. To address NRC's more recent question (reference 3), an application of a similar enhancement for other documents, e.g., maintenance, modification, and administrative documents, would have to be addressed under different mechanisms than AI-47 and would require individual consideration to evaluate benefit and practicality. At this time, TVA has not identified an immediate need for this enhancement in other plant documents. Use of should and shall in plant documents will be consistent with the program established as part of the procedures upgrade program described in section VI.C.1 of the Nuclear Performance Plan, Volume 1.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Director  
Nuclear Licensing and  
Regulatory Affairs

cc: See page 3

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cc: Mr. K. P. Barr, Acting Assistant Director  
for Inspection Programs  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Ms. S. C. Black, Assistant Director  
for Projects  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

Sequoyah Resident Inspector  
Sequoyah Nuclear Plant  
2600 Igou Ferry Road  
Soddy Daisy, Tennessee 37379