

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
5N 157B Lookout Place

JUL 01 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

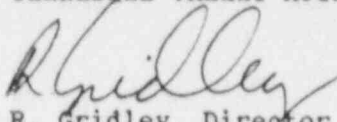
SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327/87-66 AND
50-328/87-66 - SYSTEM ALIGNMENT INSPECTION - REVISED RESPONSE TO VIOLATION

Enclosed is our revised response to Kenneth P. Barr's December 21, 1987
letter to S. A. White that transmitted a notice of violation
50-327, -328/87-66-01. This revised response clarifies the process by
which Administrative Instruction (AI) 58 was reviewed and approved.

If you have any questions, please telephone M. J. Ray at 615/870-6422.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

cc (Enclosure):

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

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ENCLOSURE

REVISED RESPONSE TO NRC INSPECTION REPORT NUMBERS
50-327/87-66 AND 50-328/87-66
KENNETH P. BARR'S LETTER TO S. A. WHITE
DATED DECEMBER 21, 1987

Violation 50-327, -328/87-66-01

"A. Technical Specification (TS) 6.8.1 requires that procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Revision 2, be established, implemented, and maintained. This includes administrative procedures. The requirements of TS 6.8.1 are implemented by Administrative Instruction AI-2 titled 'Authorities and Responsibilities for Safe Operation and Shutdown', Administrative Instruction AI-4 titled 'Preparation, Review, Approval and Use of Plant Instructions', and Administrative Instruction AI-30, titled 'Nuclear Plant Method of Operation.' Operation Section Administrative Letter OSLA-58, titled 'Maintaining Cognizance of Operational Status - Configuration Control', implements the requirements of AI-2 and AI-30 for maintaining configuration control.

Contrary to the above, prior to October 30, 1987, the licensee failed to adequately establish, implement, and maintain procedures for configuration control as follows:

1. The licensee failed to adequately specify when configuration control should start in that OSLA-58 requires the unit's lead operator to maintain configuration control records only after the System Operating Instruction (SOI) checklists are completed, but not while the checklists are in progress.
2. The licensee failed to specify in AI-2 or OSLA-58 an appropriate method for deviating from SOI checklists in that deviations to SOI checklists were not considered as procedure changes. Because of this, the licensee did not use the appropriate criteria or approval level for processing deviations.
3. The licensee failed to adequately implement the requirements in AI-4 and OSLA-58 for the use of working copies of SOI checklists in that the completed working copy for SOI valve checklist 68.1A indicated the checklist was not properly performed while the final copy did not. AI-4 requires that information be transferred from the working copy to the final copy after the completion of work.
4. The licensee failed to implement the requirements in OSLA-58 for recording of deviations from SOI checklists in that the designated unit operator was not placing the date next to his initials when deviating an item on the status file copies of checklists as required by OSLA-58.

5. The licensee failed to implement the requirements in OSLA-58 for maintaining configuration control after SOI checklists are complete in that the documented positions in the configuration control system for the four Reactor Coolant Pump Seal Return Flow Control Valves, the Excess Letdown Heat Exchanger Supply Containment Isolation Valve, and the three Boron Injection Tank recirculation valves disagreed with the actual positions.
6. The licensee failed to implement the requirements in OSLA-58 for processing a revision to SOI checklist 63.1d in that the configuration log entries for RHR supply valves 2-FCV-74-1 and 2-FCV-74-2 were cleared when the checklist revision was received without reperforming the portion of the checklist that had been revised. This resulted in the documented positions in the configuration control system being in disagreement with the actual positions.

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

Admission or Denial of the Violation

TVA admits the violation and all examples stated.

Reason for the Violation

An inadequate instruction letter (Operations Section Letters Administrative [OSLA] 58), coupled with a lack of management attention to the system alignment and configuration control program, was the cause of this violation.

Corrective Steps That Have Been Taken

Corrective actions taken with respect to this violation include the conversion of OSLA-58 to Administrative Instruction (AI) 58. This conversion included addressing the procedural problem areas identified in this violation. Additionally, AI-58 was reviewed through the independent qualified reviewer process and approved by appropriate responsible manager.

Management personnel were assigned to directly supervise the system alignment program, and training was given to all personnel involved in this program regarding the importance of following procedures. OSLA-107 was performed on all AI-58 Appendix A checklists before their performance.

Corrective Steps That Will Be Taken to Avoid Further Violations

The corrective actions taken with respect to this violation should be sufficient to prevent further violations of this nature.

Date When Full Compliance Will Be Achieved

All corrective actions referenced in this response have been completed.

Specific corrective actions for the examples of the violation are given below.

Example 1

"The licensee failed to adequately specify when configuration control should start in that OSLA-58 requires the unit's lead operator to maintain configuration control records only after the System Operating Instruction (SOI) checklists are completed, but not while the checklists are in progress."

Corrective Steps That Have Been Taken

OSLA-58 was converted to AI-58; AI-58, revision 1, section 3.2.f, specifically requires configuration control to be maintained throughout the performance of an SOI checklist. Additionally, involved permanent and temporary SQN Operations Group employees have received training on AI-58. This training was conducted before employees used the revised procedure.

Example 2

"The licensee failed to specify in AI-2 or OSLA-58 an appropriate method for deviating from SOI checklists in that deviations to SOI checklists were not considered as procedure changes. Because of this, the licensee did not use the appropriate criteria or approval level for processing deviations."

Corrective Steps That Have Been Taken

AI-58 addresses checklist deviations in section 3.5. The method of deviation meets approval and implementation criteria of technical specifications 6.8.3 and 6.5.1A.1a. Deviations now receive the same level of review as a temporary procedure change. Involved Operations Group employees have been trained on the deviation process.

Example 3

"The licensee failed to adequately implement the requirements in AI-4 and OSLA-58 for the use of working copies of SOI checklists in that the completed working copy for SOI valve checklist 68.1A indicated the checklist was not properly performed while the final copy did not. AI-4 requires that information be transferred from the working copy to the final copy after the completion of work."

Corrective Steps That Have Been Taken

An assistant shift supervisor was assigned to directly supervise this activity, and involved employees were retrained on procedural compliance.

Example 4

"The licensee failed to implement the requirements in OSLA-58 for recording of deviations from SOI checklists in that the designated unit operator was not placing the date next to his initials when deviating an item on the status file copies of checklists as required by OSLA-58."

Corrective Steps That Have Been Taken

Employees involved were counselled on the importance of adhering to procedures. Additionally, new designated unit operators and a shift management member were selected to supervise system and valve alignment verification reperformance.

Example 5

"The licensee failed to implement the requirements in OSLA-58 for maintaining configuration control after SOI checklists are complete in that the documented positions in the configuration control system for the four Reactor Coolant Pump Seal Return Flow Control Valves, the Excess Letdown Heat Exchanger Supply Containment Isolation Valve, and the three Boron Injection Tank recirculation valves disagreed with the actual positions."

Corrective Steps That Have Been Taken

Management personnel were assigned to directly supervise the system alignment activities, and involved employees were retrained regarding the importance of following procedures. Additionally, the issuance of AI-58, which addresses the identified program deficiencies, should aid in preventing further violations of this nature.

Example 6

"The licensee failed to implement the requirements in OSLA-58 for processing a revision to SOI checklist 63.1d in that the configuration log entries for RHR supply valves 2-FCV-74-1 and 2-FCV-74-2 were cleared when the checklist revision was received without reperforming the portion of the checklist that had been revised. This resulted in the documented positions in the configuration control system being in disagreement with the actual positions."

Corrective Steps That Have Been Taken

Management personnel were assigned to directly supervise the system alignment activities, and involved employees were retrained regarding the importance of following procedures. Additionally, the issuance of AI-58, which addresses the identified program deficiencies, should aid in preventing further violations of this nature.