



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

Report Nos.: 50-327/86-23 and 50-328/86-23

Licensee: Tennessee Valley Authority  
6N38 A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Docket Nos.: 50-327 and 50-328

License Nos.: DPR-77 and DPR-79

Facility Name: Sequoyah 1 and 2

Inspection Conducted: March 20-21, 1986

Inspector: *A. B. Ruff* *fr* *4-21-86*  
A. B. Ruff Date Signed

Approved by: *T. E. Conlon* *4-21-86*  
T. E. Conlon, Section Chief Date Signed  
Plant Systems Section  
Division of Reactor Safety

SUMMARY

Scope: This special, unannounced inspection entailed 14 inspector-hours on site in the areas of a worker's allegation with regard to a TVA Nonconforming Condition Report (NCR No. 2821 of January 24, 1983) in the electrical area that was purported to be dispositioned by a party that was not qualified.

Results: No violations or deviations were identified.

## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*P. R. Wallace, Plant Manager
- \*H. R. Rogers, Compliance Engineer
- \*J. H. Sullivan, Regulatory Engineering Section, Supervisor
  - P. Craghead, Technical Supervisor On-site Electrical Design
  - D. Kirk, Electrical Engineer Associate, SQEP
  - J. Duck, Electrical Engineer Associate, SQEP
  - S. Miller, Engineering Aide, Site Service Regulatory Engineering
  - H. Fischer, Manager of Nuclear Service Branch

Other licensee employees contacted included engineers, technicians, security office members and office personnel.

#### NRC Resident Inspector

- \*L. Watson, Resident Inspector

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on March 21, 1986, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

### 3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

### 4. Unresolved Items

Unresolved items were not identified during the inspection.

### 5. Worker's Allegation

#### a. Potential Problem

On April 25, 1985, a TVA worker made the following allegation to the NRC investigation staff in Atlanta, Georgia: NCR 2821, dated

January 24, 1983, was not properly dispositioned in that the individual who dispositioned the NCR was not qualified to disposition that particular NCR which involved electrical cable.

b. Observations and Record Review

(1) Interviews, Procedures and Records

The NRC inspector interviewed several workers at the site. The workers were on the site at the time NCR 2821 was issued (January 1983) or were familiar with some of the actions taken with regard to the specific NCR. The interviews were used to familiarize the inspector with the construction organization and its functioning and to obtain information with regard to NCR 2821.

Sequoyah Procedure No. P-2, "Handling Nonconformances" in effect at the time of NCR 2821 processing was reassembled from microfilm records and was examined with regard to the alleged infraction.

NCR-2821 and related records were obtained from microfilm records.

A portion of TVA's Nuclear Safety Review Staff (NSRS) Report I-84-36 SQN of March 15, 1985, which contains a similar allegation on the same NCR was reviewed. This report was given to the NRC inspector by a TVA worker who was interviewed as part of NRC's inspection.

- (2) NCR 2821. This NCR was issued on January 13, 1983, as a result of a receiving inspection performed on cable received from Watts Bar on transfer request 833041. The NCR shows that cable received from Watts Bar was identified by TVA Mark No. WDU. This mark number at Sequoyah identifies cable for Class IE use (Quality Assurance (QA) Program use), while at Watts Bar the same mark number is for non Class IE use [Non QA use].

The NCR file includes TVA form 45D, dated January 13, 1983, which is a correspondence record between the Design Project Organization (DPO) at Knoxville and the site Electrical Engineering Unit (EEU). This document shows that these organizations were involved in the disposition action of this cable. The correspondence record states in part, "Transfer Reg. 833041 was issued to move 1 Reel (2000-ft.) of mark WDU from WBN to SQN. This cable was received at SQN and we discovered that WDU at SQN is Class IE and at WBN WDU is Class II. Please nonconform this cable ... Due to the low cost of WDU (1/2 #12 AWG) it will probably be more cost effective for TVA to use this as temporary cable at SQN rather than returning it to WBN."

The recommended disposition which was part of the NCR was in agreement with the above in that it stated to use the wire in the Field Service Building. This building is a non-QA structure and electrical wiring used in this building does not have to be Class IE (QA).

The recommended disposition and Construction Engineers approval was signed by one individual on January 24, 1983. This is not considered to be good practice; however, for this case, it is considered satisfactory and is not a violation of NRC requirements. This position is based on information received by interviews, examination of records and the down grading of the cable to a non-QA status.

- (3) Procedure P-2, Handling of Nonconformances. This procedure applies to all equipment, materials, structures and components within the scope of the Quality Assurance Program. The following are excerpts from this procedure which was in effect at the time NCR 2821 was processed:

6.A1 of Procedure P-2: "Individuals involved in any capacity with activities, materials, structures, components, or systems within the scope of the Quality Assurance Program shall promptly notify personnel in Construction Engineers Office (CEO) of any condition considered to be nonconforming."

The party who initiated and signed the NCR on January 13, 1983, was in the Mechanical Engineering and Materials Inspection (ME&I) Units.

6.B1 of Procedure P-2: "Unit Supervisor After signing the report and obtaining a report number from the Quality Control Records Unit (QCRU), the initiator submits the report to his unit supervisor who proposes and/or approves corrective action, proposes and/or approves action to prevent recurrence, and then initials or signs next to the initiator's signature to signify his approval.

The supervisor of ME&I units performed this action on January 24, 1983. Also, it appears that DPO was contacted on this date. (See 2 above for discussion concerning correspondence with DPO).

6.B1 of Procedure: "Construction Engineer (or designee) After the unit supervisor's approval is obtained, the NCR shall be submitted to the construction engineer or his designee who shall review the report and indicate his approval by signing the NCR in Section 7 of Attachment A. Additionally, the construction engineer or his designee shall indicate by checking the appropriate box in Section 7 of the NCR whether the condition is significant (see definition). He shall also indicate whether disposition is to be assigned by DPO.

Discussion with site workers indicated that the ME&I Units Supervisor acted for the Construction Engineer (CE) when the CE was not available. The ME&I Units Supervisor signed for the CE on this NCR to satisfy this requirement on the specific day in question.

During the inspection, it was noted that minor procedural deficiencies could be applied to the processing of NCR 3821. These deficiencies involved time periods.

- (a) The NCR should be approved within approximately three working days of its identification.
- (b) The NCR should be declared significant if it has not been determined to be significant or nonsignificant within eight calendar days of the identification.

The NCR was initiated and signed on January 13, 1983 and it was approved and declared non-significant on January 24, 1983, (eleven calendar days). These "should be" periods are TVA guidelines and are intended to expedite NCR processing and to ensure that the NRC is notified in a timely manner for those items that fall under 10 CFR 50.55

#### (4) Requirements

Based on DPO and EEU correspondence of January 13, 1983, this cable [see 2 above] was non-Class IE (non-QA) at Sequoyah and it was specified for non QA work. The time periods did not affect Class IE work. The inspector examined other electrical NCR that were written over a six month period of time (three months preceding and three months following NCR 2821) and no similar discrepancies were noted.

The review of Procedure P-2 and NCR 2821, revealed minor editorial errors; however, it is considered that intended functions of these documents were satisfied.

#### c. Disposition of Cable on NCR 2821.

NCR designated cable for Non-QA work.

A discussion with workers indicated that this cable would, in all probability, be identified for Non-QA use by Watts Bar marking or tagging of the cable reel and that similar instructions may have been part of the instructions to the warehouse to release this cable to construction craftsman.

A discussion with workers indicated that TVA form 575 was used for material release instructions (material requisition). The use of this form was specified in TVA's Accounting Procedure 2 and was used as a device for accounting and controlling material inventory. The material requisition documents are not QA records and, therefore, not retained as permanent records. However, from NSRS report I-84-34-SQN of March 15, 1985, a material requisition document (#1690) was found for cable covered by NCR 2821. Instructions on the material requisition document, approved by EEQ on January 31, 1983, indicates that this cable was to be released for use on Engineering Change Notice (ECN)L-5495. This ECN was applicable to the Field Service Building which is a non QA structure.

In addition, the inspector looked at cable records for cable used in 10 CFR 50.49 program. No cable bearing Mark No. WDU is used in that program.

d. Summary and Conclusions

- The allegation was not substantiated.
- Procedural discrepancies were noted but were considered insignificant and did not detract from the intent of the program.
- The EEU and DPO were involved with the disposition action on the NCR.
- NCR was signed by proper personnel.
- NCR dispositioned cable for non QA use.