

## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

Docket Nos. 50-327/328

APR 3 0 1986

Tennessee Valley Authority ATTN: Mr. Steven A. White Manager of Nuclear Power 6 North 38A Lookout Place 1101 Market Street Chattanooga, Tennessee 37402-2801

Gentlemen:

SUBJECT: SPECIAL INSPECTION OF EMPLOYEE CONCERN PROGRAMS AT SEQUOYAH NUCLEAR

POWER PLANT

A special announced inspection of the Employee Concern Programs (ECP) was conducted by the NRC staff at the Sequoyah Nuclear Power Plant on April 8-11, 1986. The staff discussed the inspection findings/observations with Mr. H. L. Abercrombie and other members of your staff on April 11, 1986. These items are as follows.

- 1. There are presently four separate ECP-related activities ongoing at Sequoyah, composed of the new ECP initiated February 1, 1986 and the completion activities associated with the three programs in effect at Sequoyah prior to February 1, 1986. There was no documentation available at Sequoyah describing the linkage between the previous and the current ECPs.
- 2. The basis for classification of employee concerns as Potentially Safety Related (PSR) by the ECP Site Representative is not consistent with the classification by Quality Technology Company (QTC)/Nuclear Safety Review Staff (NSRS) under the Watts Bar Special Program.
- 3. The ECP Site Representative is not identifying subsidiary (offshoot) concerns separate from the main concerns, as was done by QTC/NSRS.
- 4. There is presently no second-party review or audit of the ECP files created by the ECP Site Representative.
- Data from several ECP sources have not been transmitted to the NRC as follows:
  - a. Onsite ECP prior to February 1, 1986,
  - b. Generic Concerns Task Force Reports, and
  - c. Onsite ECP since February 1, 1986.

6. Of a sample of 21 Generic Concerns Task Force Reports, 15 were evaluated as reaching conclusions not substantiated by the report or associated files. All reports involved issues identified as potentially safety related and requiring resolution prior to unit startup.

This is the NRC staff's first review of completed work under TVA's new ECP program. The NRC staff is particularly concerned that its review of resolved concerns has shown either an inadequate basis or an inadequately documented basis for resolution of potential safety-related concerns. This requires TVA management attention to ensure that comprehensive reviews and corrective action determinations are made and that sufficient backup documentation is provided to support conclusions. Upon completion of these report packages, they should be transmitted to the NRC for review.

A formal inspection report will be issued in the near future. This letter does not require a response, but should be factored into your planned ECP submittal to NRC.

Sincerely,

dames M. Taylor, Director Office of Inspection and Enforcement

cc:

H. L. Abercrombie, Sequoyah Nuclear Plant Site Director

P. R. Wallace, Sequoyah Plant Manager

K. W. Whitt, Chief

Nuclear Safety Review Staff D. L. Williams, Jr., Supervisor,

Licensing Section

G. B. Kirk, Compliance Staff Supervisor

J. E. Wills, Project Engineer

K. Jenison, Senior Resident Inspector

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