TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

FEB 03 1987

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Attention: Dr. J. Nelson Grace

In the Matter of	)	Docket Nos. 50-327
Tennessee Valley Authority	)	50-328

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - ENGINEERING CHANGE NOTICE (ECN) CLOSEOUT AND FINAL SAFETY ANALYSIS REPORT (FSAR) UPDATES

This letter is provided in response to Gary G. Zech's letter to S. A. White dated December 18, 1986, requesting the schedule and justification for not requiring completion of the ECN Closeout Project and the review and correction of the FSAR discrepancy described in SQ-CAR-86-04-21 before unit restart. Enclosure 1 addresses the ECN closeout project. Enclosure 2 addresses the review and correction of SQ-CAR-86-04-21 on the Sequoyah FSAR. Enclosure 3 contains the list of commitments contained in enclosures 1 and 2.

If you have any questions, please get in touch with M. R. Harding at (615) 870-6422.

To the best of my knowledge, the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer

J. A. Domer, Assistant Director
Nuclear Safety and Licensing

Enclosures
cc: See Page 2

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cc (Enclosures):

Mr. J. J. Holonich
Sequoyah Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20814

Director of Nuclear Reactor Regulation
Attn: Mr. B. J. Youngblood, Project Director
PWR Project Directorate No. 4
Division of PWR Licensing A
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. G. G. Zech, Director
TVA Projects
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Sequoyah Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy Daisy, Tennessee 37319

ENCLOSURE 1
ECN BACKLOG CLOSURE

This enclosure provides a description of the ECN closure effort at Sequoyah, the results of that effort to date, and TVA's plans for resolving the backlog of field complete ECNs after restart of Sequoyah unit 2.

The ECN is implemented through the use of workplans which address all aspects of the work to be performed (i.e., QA, ANII, Safety, Design, Operations, etc.). There may be a number of workplans required for one ECN. The workplan process is the vehicle which ensures all work is complete including the as-configuring of required drawings. The workplan closeout process requires that, as a workplan is field completed, the cognizant engineer mark up the drawings located in the main control room such that those drawings reflect the modification. These drawings are later as-constructed as part of the workplan closeout process.

As noted in Gary G. Zech's letter to S. A. White dated December 18, 1986, Sequoyah established an ECN Closure Verification Program in August 1985. The function of this program was to ensure all workplans and associated drawings authorized by the ECN and implemented by the workplan(s) are complete and in agreement before closing the ECN (i.e., sum of the workplans equals 100 percent of the work required by the ECN). This effort was initiated to streamline the closure process and help resolve the backlog of field complete ECNs which had accumulated. The ECNs chosen for closure under this effort were first selected from a list of field completed Critical Structures Systems and Components (CSSC) ECNs and later from those CSSC ECNs associated with the 37 systems or portions of systems included in phase 1 of the Design Baseline and Verification Program (DB&VP). Within these two priority areas, ECNs were randomly selected for closure.

In an effort to evaluate potential problem areas before restart, the ECN Closure Group performed a review of the primary drawings (those in the main control room) associated with the CSSC ECNs statused as complete to identify and initiate any corrective actions necessary. The last review of this type (primary drawing review) was completed around October 1, 1986, and brought the total reviewed to approximately 450 CSSC ECNs. These ECNs still cannot be closed, however, until the secondary drawings (remaining workplan drawings) have also been reviewed. At present, the ECN Closure Group has performed primary drawing reviews on 450 of the approximately 670 CSSC ECNs and verified for closure more than 100 of the total of approximately 1,150 field completed ECNs which constitute the present ECN backlog. It should be noted, however, that none of these reviews discussed above have identified any significant discrepancies. The problems have instead been minor errors which would not impact system operability or reliability.

In addition to the efforts of the ECN Closure Group, Sequoyah, through the DB&VP, is evaluating the potential effects of partially implemented or unimplemented ECNs on the operability of the 37 systems or portions of systems included in phase 1 of the DB&VP.

Therefore, considering that (1) the review of primary drawings on 450 CSSC ECNs and closure verification of 100 plus ECNs has not identified any significant discrepancies, (2) the ECN Closure Group efforts have been focused on CSSC ECNs, (3) the main control room drawings are marked up upon field completion of the workplan (i.e., no delay because of ECN closure process), and (4) the DB&VP evaluates the effects of ECNs on system operability, the resolution of the ECN backlog is not considered necessary before restart.

If any significant discrepancies or nonconformances are identified through the ECN closure process (or any other process), they will be addressed expeditiously in accordance with existing plant procedures (i.e., PRO, CAQ, PIR, etc.) to ensure the appropriate level of attention is received and the condition resolved in a timely manner.

To correct the condition which allowed the backlog to develop in the first place, the FSAR corrective actions described in enclosure 2 will institute timeframes for ECN closure (i.e., require timely closure of ECNs and ensure their inclusion in annual FSAR updates).

With the estimated man-hours required to close the current backlog of field completed ECNs factored into the units 1 and 2 restart efforts, closure of the ECN backlog will be completed by October 15, 1988. The ECN Closure Verification Program will continue to address closure of CSSC ECNs on a first priority basis. This schedule will coincide with the FSAR corrective actions described in enclosure 2 and allow inclusion in the 1989 FSAR update.

ENCLOSURE 2
CORRECTIVE ACTION FOR
SEQUOYAH NUCLEAR PLANT FSAR

Corrective Action Report (CAR) SQ-CAR-86-04-021 was initiated in April 1986 based on inadequacy of the existing procedures relating to the update of the Sequoyah FSAR to ensure that all appropriate documents which could affect the FSAR (i.e., 10 CFR 50.59 evaluations, technical specification changes, modifications, submittals, etc.) are reviewed for inclusion in the FSAR.

In response to CAR 86-04-021 and Gary G. Zech's December 18, 1986 letter to S. A. White, a three-phase program to address deficiencies in the present update program and potential deficiencies in the Sequoyah FSAR has been identified. This program consists of (1) providing the 1987 Annual Update (scheduled for April 15, 1987), (2) establishment of a new FSAR Update Program, and (") implementation of an FSAR Verification Program.

Phase 1, the 1987 FSAR Update, will reflect the "as-configured" condition of the plant as verified by the Design Baseline and Verification Program (DB&VP). This update will include the following elements:

- "As-configured" drawings (Approximately 53 new drawings to be provided in 1987 update)

- Effects of Technical Specification Changes Approved Since The Last Update

- Effects of Facility Changes, ECNs Verified Complete and Closed Since The Last Update

- Effects of Changes to Procedures Described in the FSAR Since The Last Update

- Changes Necessary to Reflect Information and Analyses Submitted to NRC Since the Last Update.

The 53 "as-configured" drawings are a subset of the approximately 1,000 drawings identified by Operations in the primary drawing list. Additional "as-configured" drawings will be provided in future updates as they become available.

The annual update (Amendment 4), as required by 10 CFR 50.71(e), has a filing due date of April 15, 1987.

Phase 2, development of a new FSAR Update Program, will establish provisions for a more accurate, up-to-date description of the plant to be reflected in the FSAR. This update program will provide the appropriate standard, divisional, and site procedures necessary to interface updating the FSAR with the responsible organizations. These procedures will provide guidance for the lead and support organizations as to their responsibilities, what to inclu in an update, how an FSAR change is submitted and the timeframes within which changes must be completed. This process will include provisions to ensure that modifications completed during the previous year are incorporated in the next update.

The following documents will be reviewed in the update process:

- Technical Specification Changes
- Unreviewed Safety Questions (USQs) and USQDs
- Modifications/Facility Changes
- Procedure Changes
- Design Documents
- Commitments Affecting the FSAR
- NRC Inspection Reports
- Operating Experience Reviews (OER)
- Conditions Adverse To Quality (CAQs)
- Potential Reportable Occurrences (PROs) and/or Licensee Event Reports (LERs)
- Temporary Alteration Change Forms (TACFs)

The schedule guidelines for milestones in development of the new FSAR Update Program are given below. This schedule is provided as a guideline with only the final completion date as a commitment.

PHASE 2 MILESTONES	SCHEDULE GUIDELINE
Preparation of Standard and Divisional Procedures	August 1987
Preparation of SQN Site Procedures	October 1987
Training of employees on Procedures (as necessary)	October 1987

The committed completion date for the new FSAR Update Program is October 15, 1987, which will allow its use in preparing the 1988 update.

The final phase of this three-part FSAR program is the implementation of an FSAR Verification Program. This program will include documentation, for future reference, of that which was included in the review as well as deficiencies which were identified. This program will also provide the

basis on which future updates will be prepared. Additionally, the verification program will be driven by the results of the DB&VP and ECN closure process. The FSAR Verification Program will provide:

- Verified "As-Configured" Drawings
- Review of the Effects of Past Licensing Submittals on the FSAR
- Review of the Effects of Technical Specification Changes on the FSAR
- Review of the Effects of Past Design Changes on the FSAR
- A FSAR Statement Verification

The statement verification process will ensure that requirements contained in the FSAR are reflected in plant procedures. The schedule for implementation of the Verification Program is shown below. Again, this schedule is provided as a guideline with only the final completion date as a commitment.

PHASE 3 MILESTONES	SCHEDULE GUIDLINE
Prepare Bid Specification	June 1987
Procurement Process	October 1987
Bid Evaluation/Contract Award	December 1987
Verification Process	August 1988

The committed completion date for the FSAR Verification Program is October 15, 1988, which will coincide with ECN backlog closure and will provide an accurate FSAR with the April 1989 update.