

January 12, 1987

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

Gentlemen:

SUBJECT: REPORT NOS. 50-327/86-46 AND 50-328/86-46

Thank you for your response of December 5, 1986, to our Notice of Violation issued on November 5, 1986, concerning activities conducted at your Sequoyah facility. We have evaluated your response to the cited violations, and, except for those relating to Violations 50-327, 328/86-46-07 (Example 2) and 50-327, 328/86-46-08, find that they meet the requirements of 10 CFR 2.201. We will examine the implementation of your corrective actions during future inspections.

With respect to your response to Violation 50-327, 328/86-46-07 (Example 2) you indicate that standard practice SQA-21 has been completely rewritten to accurately implement the requirements for PORC as delineated in the Technical Specifications (TS). During our review of SQA-21, it came to our attention that you were still not meeting the intent of the PORC staff listing in TS 6.5.1.1 since SQA-21 still identified PORC members by job categories instead of individuals. This concern was discussed with Mr. M. R. Harding of your staff on December 17, 1986. It is our understanding that you will submit a supplemental response by January 23, 1987, addressing your actions (both taken and planned) in response to this concern.

After careful review of the bases for your denial of Violation 50-327, 328/86-46-08, we have concluded, for the reasons presented in the enclosure to this letter, the violation occurred as stated in the Notice of Violation. Therefore, pursuant to 10 CFR 2.201, please submit to this office within 30 days of the date of this letter, a written statement describing the reasons for the violation, the corrective steps which have been taken and the results achieved, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC's Public Document Room.

The response directed by this letter is not subject to the clearance procedure for the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

8702090375 870112  
PDR ADOCK 05000327  
G PDR

We appreciate your cooperation in this matter.

Sincerely,

Original signed by

J. Nelson Grace  
Regional Administrator

Enclosure:

Staff Assessment of Licensee's Denial  
of Violation 50-327, 328/86-46-08

cc w/encl:

- ✓ H. L. Abercrombie, Site Director
- ✓ Sequoyah Nuclear Plant
- ✓ P. R. Wallace, Plant Manager
- ✓ R. W. Cantrell, Acting Director
- ✓ Nuclear Engineering
- ✓ R. L. Gridley, Director
- ✓ Nuclear Safety and Licensing
- ✓ M. R. Harding, Site Licensing Manager

bcc w/encl:

- ✓ G. G. Zech, RII
- ✓ H. R. Denton, NRR
- ✓ H. L. Thompson, NRR
- ✓ J. M. Taylor, IE
- ✓ B. B. Hayes, OI
- ✓ S. R. Connelly, OIA
- ✓ K. P. Barr, RII
- ✓ NRC Resident Inspector
- ✓ NRC Document Control Desk
- ✓ State of Tennessee

RII

RII

RII

RII

RII

RII

NRR

OB Brady:er

RCarroll

KBarr

GZech

GJenkins

MErnst

12/17/86

12/19/86

1/2/87

1/7/87

/ /

1/8/87 / /

ENCLOSURE

In regard to your denial of Violation 50-327, 328/86-46-08, we acknowledge that your initial III.D.1.1 leak test results for Unit 1, and related inspection/leak test procedures for Units 1 and 2 were found acceptable during the licensing process. It is apparent, however, that both NUREGs 0578 and 0737 required that a periodic testing program, as well as a preventive maintenance program be established/implemented as part of the intended leak reduction program. TS 6.8.5 was imposed to ensure that the leak reduction program indicated in NUREGs 0578 and 0737 was conducted as intended. Accordingly, TS 6.8.5 specifically requires preventive maintenance as an item that the leak reduction program is to include in addition to periodic visual inspection and integrated leak testing.

Preventive maintenance includes regularly scheduled time based actions dependent on operating hours or calendar time. The maintenance performed as a result of your SI-632 (series) visual inspection is considered corrective, not preventive. Consequently, since your response fails to show how the leak reduction program at Sequoyah included preventive maintenance, the violation is still considered appropriate. We do feel, however, that your indicated plan to implement a tracking and trending process into your leak reduction program is a positive step in correcting the described deficiency.