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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place
86 SEP 23 P 3:38

SEP 22 1986

U.S. Nuclear Regulatory Commission ✓
Region II
ATTN: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-328/86-39 - RESPONSE TO VIOLATION

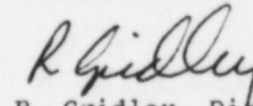
Enclosed is our response to Gary G. Zech's August 21, 1986 letter to
S. A. White which transmitted Notice of Violation No. 50-328/86-39-01 for our
Sequoyah Nuclear Plant. Enclosure 1 is our response to the subject
violation. We do not recognize any other actions described herein or the
subject inspection report as commitments.

If you have any questions, please get in touch with M. R. Harding at
615/870-6549.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Director
Nuclear Safety and Licensing

Enclosure
cc (Enclosure):

Mr. James Taylor, Director
Office of Inspection and Enforcement
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

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ENCLOSURE 1
RESPONSE - NRC-OIE INSPECTION REPORT
NO. 50-328/P6-39
GARY G. ZECH'S LETTER TO S. A. WHITE
DATED AUGUST 21, 1986

Violation 50-328/86-39-01

During the Nuclear Regulatory Commission (NRC) inspection conducted on June 23-26, 1986, a violation of NRC requirements was identified. The violation involved failure to report errors discovered in INCORE program calculations. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

10 CFR 50.73, paragraph (a)(2)(i)(B) requires the licensee to report in a Licensee Event Report any operation or condition prohibited by the plant's Technical Specifications.

Technical Specification 3/4.2.2 requires an axial flux curve $W(z)$ to be used in a monthly surveillance of $F_q(z)$. Technical Specification 3/4.2.3 requires that rod bow penalty factors be used to perform a monthly surveillance of the parameter R_2 .

Contrary to the above, Cycle 3 was operated from December of 1984 through August 1985, with incorrect $W(z)$ and rod bow penalty data used for all the monthly $F_q(z)$ and R_2 surveillances, failure to use correct $W(z)$ and rod bow penalty data when monthly surveillances were performed did not comply with Technical Specifications. When the error was discovered, it was not reported to the NRC as required by 10 CFR 50.73.

This is a Severity Level V violation (Supplement I).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

The violation is attributed to misunderstanding of the guidance provided for reporting events of this nature.

3. Corrective Steps Taken and Results Achieved

An LER will be submitted by October 15, 1986.

4. Corrective Steps Taken to Avoid Future Violations

Due to the nature of this violation, a meeting with the NRC is considered necessary to ensure understanding of the reporting requirements. This will help ensure that events of which NRC has a high interest and which do not clearly fall under a 10 CFR 50.73 rule are properly evaluated and LERs written.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by October 15, 1986, when the LER is submitted.