

# TENNESSEE VALLEY AUTHORITY

5N 157B Lookout Place

April 24, 1986

28 P2:04

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  
50-327/85-45 AND 50-328/85-45- REVISED RESPONSE TO VIOLATION

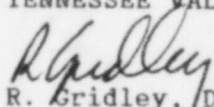
Enclosed is our revised response to violation 50-327, -328/85-45-09. This is a revision to our March 20, 1986 response to J. A. Olshinski's February 18, 1986 letter to S. A. White transmitting IE Inspection Report Nos. 50-327/85-45 and 50-328/85-45 for Sequoyah Nuclear Plant which cited TVA with two Severity Level IV Violations. In my March 20 response, we stated that the preventative maintenance (PM) program was established and the statement in the violation was incorrect. However, the surveillance instruction which performs this PM program was actually issued three days after the inspection team's exit. We have identified changes with a bar in the right margin.

If you have any questions, please get in touch with R. E. Alsup at FTS 858-2725.

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: Mr. James Taylor, Director (Enclosure)  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Violation 50-327/85-45-09 and 50-328/85-45-09

Technical Specification 6.8.1 states that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 recommended that maintenance that can affect the performance of safety related equipment should be performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances, and additionally recommended that the control of maintenance, repair, replacement, and modification work be covered by written procedures.

Contrary to the above, three examples were noted where the licensee failed to properly implement required procedures. Specifically:

- a. During performance of valve rewiring activities on valve 2-FCV-70-134, in accordance with work plan 11853, NUREG-0588, 10 CFR 50.49, Valve Rewiring, and electrical jumper was not removed from the valve as required by the work plan.
- b. 14 Pall Trinity Micro Corporation preventative maintenance recommendations associated with auxiliary air compressor dryers were not taken into consideration during development of the preventative maintenance program as required by Standard Practice Procedure SQM-57, Preventative Maintenance. This resulted in no preventative maintenance being established and implemented for these dryers.
- c. Numerous and sustained housekeeping deficiencies were noted in auxiliary building contaminated areas. This condition reflected that requirements of Standard Practice Procedure SQM-66, Plant Housekeeping, with regard to ensuring clean up of work areas upon completion of maintenance or modification work and with regard to adequate performance of housekeeping checks were not complied with.

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

1. Admission or Denial of Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

- a. This portion of the violation occurred due to personnel error in that the jumper was not removed as required by the workplan.
- b. This portion of the violation occurred because Sequoyah Standard Practice SQM57 was not interpreted to mean all vendor recommendations had to be followed and incorporated into the initial preventative maintenance (PM) program.

In the March 20, 1986 response, SQN stated that a PM program was established and the statement in the violation was incorrect. However, the surveillance instruction (SI) which performs this PM program was actually issued three days after the inspection team's exit, and the violation was correct as stated in the report. The SI change was initiated to perform quarterly dewpoint checks in response to recommendations made by an onsite task force performing a surveillance on the Auxiliary Control Air System.

- c. This portion of the violation occurred because final cleanup of these areas had not been initiated since the present outage schedule is indeterminate, and additional work activities in these areas could be identified. Modification and maintenance activities had been performed or were ongoing in the cited areas during the inspection period.

3. Corrective Steps Taken and Results Achieved

- a. A maintenance request was issued to visually inspect all unit 2 valves that were functionally tested in accordance with the modifications package to ensure that there were no other occurrences of jumpers not being removed. No similar occurrences were identified.
- b. SQM57 has been revised to clearly address how vendor recommendations are utilized in the development of the PM program. Additionally, the applicable vendor recommendations for the air dryers have been reviewed, and appropriate PM activities have been added to the PM program.
- c. The excess materials were removed, and the areas were cleaned. The NRC inspection team (maintenance reinspection) on site during the period February 24-28 reinspected the areas and indicated in the exit meeting that they were satisfied with the results.

4. Corrective Steps Taken to Avoid Further Violations

- a. An instruction change has been issued to include an inspection to verify correct wiring on the valves before the functional test is performed. This change was incorporated before the unit 1 testing.  
  
In addition, all crews involved with the modifications package have been instructed on the requirements to follow established procedures.
- b. SQM57 has been revised to clearly address vendor recommendations.
- c. General cleanup activities are continuing. A comprehensive cleanup and housekeeping inspections will be performed before restart of the respective units.

5. Date When Full Compliance Will Be Achieved

- a. The plant was in full compliance on February 25, 1986.
- b. The plant was in full compliance on February 25, 1986.
- c. The plant was in full compliance on February 25, 1986. However, as stated in 4.c above, a comprehensive cleanup and inspections will be performed before restart of the respective units.