TENNESSEE VALLEY AUTHORITY
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FEB 17 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 (SQN) UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORTS NOS. 50-327/86-66 and 50-328/86-66 - RESPONSE TO VIOLATION NOS. 50-327, -328/86-66-02 AND 50-327, -328/86-66-03

Enclosed is our response to Gary G. Zech's January 16, 1987 letter to S. A. White which transmitted Notice of Violation Nos. 50-327, -328/86-66-02 and 50-327, -328/86-66-03. Enclosure 1 is our response to the subject Notice of Violations. Enclosure 2 contains the list of commitments contained in enclosure 1. This response is also provided to satisfy the SQN Technical Specification 3.7.12 requirements for submittal of 30-day report involving a breached fire barrier. We do not recognize any other items described herein or the subject inspection report as commitments.

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

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
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Enclosures
cc: See page 2

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U.S. Nuclear Regulatory Commission

FEB 17 1987

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ENCLOSURE 1
RESPONSE - NRC-OIE INSPECTION REPORT
NOS. 50-327/86-66 AND 50-328/86-66
GARY G. ZECH'S LETTER TO S. A. WHITE
DATED JANUARY 16, 1987

Violation 50-327, 328/86-66-02

Technical Specification 6.2.2.f requires that a fire brigade of at least five members be maintained onsite at all times.

Contrary to the above, Technical Specification 6.2.2.f was not met in that a total of five qualified members of the fire brigade were not assigned to the Group 5 fire brigade shift on August 29, 1986, and the Group 4 fire brigade shift on October 14, 1986.

This is a Severity Level IV Violation (Supplement 1).

1. Admission or Denial of Violation

TVA admits the first example of this violation concerning assignment of qualified fire brigade members to Group 5 fire brigade shift on August 29, 1986. However, after further research, information not provided to the NRC inspector during this inspection has indicated that the fire brigade leader, assigned to the Group 4 fire brigade shift on October 14, 1986, was indeed qualified and this example is therefore denied.

2. Reason For The Violation

Example 1 of this violation occurred because of an error in the computer program which generates the Fire Brigade Membership Status List. This error allowed the computer program to overlook the members ineligibility because of misinterpretation of the symbol used to signify his initial certification.

3. Corrective Steps Taken and Results Achieved

Upon identification of the discrepancy between the Fire Brigade Membership Status List and the training records, the problem with the computer program was found and corrected. The status list is now consistent with the individuals training records.

4. Corrective Steps Taken To Prevent Recurrence

The corrective steps taken will prevent recurrence of this discrepancy.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 3, 1986, when the programming error was corrected.

6. Reason for Denial (Example 2 of Violation)

Upon review of the shift engineers daily journal and shift assignments for the 3 p.m. to 11 p.m. (Group 4) shift on October 14, 1986, along with the Fire Brigade Membership Status List it was determined that the individual scheduled as fire brigade leader was indeed fully qualified. It is believed that the apparent discrepancy of a qualified leader arose during the NRC inspector's review of a fire drill attendance roster also dated October 14, 1986. During that drill, another individual served as brigade leader for the purposes of training. This individual, although identified as delinquent on the October 8, 1986 status list, had completed the necessary training on October 14, 1986, before the drill and was therefore fully qualified. Since this individual completed his training on October 14, 1986, he was, of course, not statused as qualified on the October 8, 1986 status list.

This matter was perceived to constitute a violation of technical specifications 6.2.2.f for assignment of qualified brigade members, but as explained above, both the assigned and participating fire brigade leaders on October 14, 1986, were fully qualified.

Violation 50-327, -328/86-66-03

Technical Specification 3.7.12 requires that all fire barrier penetrations in fire zone boundaries protecting safety related areas shall be functional at all times.

Contrary to the above, Technical Specification 3.7.12 was not met in that on December 4, 1986 fire damper 2-31C-926 separating the 125V vital Battery Board Room IV from 6.9kV Shutdown Board Room B was found inoperable and the required limiting condition for operation had not been established.

This is a Severity Level IV Violation (Supplement 1).

1. Admission or Denial of Violation

TVA admits the violation occurred as stated.

2. Reason For The Violation

Upon investigation it was determined that the damper in question (2-DMP-31C-926) became inoperable because of a bent spring-steel locking clip. This clip is part of the closure device designed to ensure the damper remains closed once the thermal link is broken. This closure device was damaged such that instead of ensuring the damper remains closed, it was in fact holding the damper in the open position, thus making it inoperable. Since the damper was in its normal position (open) and the closure device is located on the interior of the battery board room out of normal traffic, the damaged clip and missing thermal link were not noticed and the damper was not identified as inoperable.

During the current outage, work involving scaffolding and ladders has been moderate to heavy in this area (Elevation 734, 125-V Battery Board Room IV) and it is believed that the damper may have been unknowingly damaged because of some of that work.

3. Corrective Steps Taken and Results Achieved

Upon identification of the inoperable damper (2-DMP-31C-926), action was immediately taken to manually close the damper returning it to functional status. The shift engineer was then notified that the limiting condition for operation (LCO) had been entered and now exited. Maintenance Work Request (WR) B-209412 was initiated and the damper subsequently repaired.

4. Corrective Steps Which Will Be Taken To Prevent Recurrence

Surveillance Instruction (SI) 233.3, "Visual Inspections of Penetration Fire Barriers--Fire Dampers" fulfills the surveillance requirements of technical specification 4.7.12a and b, of verifying the barriers functional by visual inspection at least once every 18 months. This SI specifically looks at the thermal link and verifies that there is nothing that would impair the damper from closing if the link were broken. The next performance of SI 233.3 is scheduled to be completed by September 19, 1987. If any further inoperabilities are identified, the appropriate corrective action will be taken.

Furthermore, an instructional memorandum will be issued to alert those personnel with job assignments which could affect the operability of fire dampers and reemphasize the importance of care and consequences of inoperable fire dampers. This memorandum will be issued by March 6, 1987.

5. Date Full Compliance Achieved

Full compliance was achieved on December 4, 1986, when the damper was returned to functional status.

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Enclosure 2

LIST OF COMMITMENTS

1. Issue an instructional memorandum to alert personnel with job assignments which could affect the operability of fire dampers and reemphasize the importance of care and consequences of inoperable fire dampers by March 6, 1987.