TENNESSEE VALLEY AUTHORITY

WATTS BAR NUCLEAR PLANT

EMPLOYEE CONCERNS TASK GROUP

OTHER SITES

CEG

Element Title: NRC Inspection 327, 328/84-35:
Valve Checklist; Fuel Handling Instruction

SWEC Concerns: A02850103007-001
A02850103007-002

Source Document: NRC Inspection Report 327, 328/84-35

Report Number: SWEC-SQN-19

Evaluator:	K. R. Gass K. R. Gass	10-8-86 Date
Reviewed by:	J. J. Knightly J. J. Knightly	10-8-86 Date
Approved by:	A. G. Debbage A. G. Debbage	10/8/86 Date

1840T

I. INTRODUCTION

During an inspection conducted on November 6 through December 5, 1984, (Reference 1) the Nuclear Regulatory Commission (NRC) inspector identified one violation and an Inspector Followup Item (IFI) which were included in the Stone & Webster Engineering Corporation (SWEC) systematic analysis:

A02850103007-001 (Violation 327, 328/84-35-01) Inadequate Valve Checklist.

A02850103007-002 (IFI 84-35-04) Inadequate Fuel Handling Procedure.

Information on the background, the corrective actions taken, the verification methodology, the verification analysis, the completion status, and any pertinent references for the area of concern is included in this report.

II. VERIFICATION OF SWEC ISSUE

A. A02850103007-001, Inadequate Valve Checklist

1. Background - Technical Specification 6.8.1 requires that written procedures be established, covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 3 of Appendix A requires specific procedures for the Emergency Core Cooling System (ECCS). System Operating Instruction (SOI)-63.1, "Emergency Core Cooling System," was established to satisfy this requirement.

   Contrary to the above, adequate procedures were not established in that Valve Checklists 63.1A-3 and 63.1A-4, Revision 26, of SOI--63.1, Revision 30, each failed to list a level transmitter root valve for the cold leg accumulators. This was identified as NRC violation 84-35-01.

2. Corrective Actions Taken - In their response (Reference 2), SQN stated that a temporary change was made to the procedure involved on November 29, 1984, to include the missing root valves. On December 12, 1984, the temporary procedure change became a permanent revision.

3. Verification Methodology - The SWEC concern identified for Employee Concerns Task Group (ECTG) verification was stated as follows:

RIMS #	ISSUE	RIMS ITEM
A02850103007	Adequate Procedures were not established in that valve checklists did not list a level transmitter root valve for cold leg accumulators	RIMS-001

ECTG reviewed the Sequoyah Compliance Licensing Files for internal and external correspondence related to this issue, applicable procedures, and NRC status and closure files. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis - The ECTG review of the pertinent documents indicated that the corrective actions for this concern and the violation have been completed. SOI-63.1 was verified to include the two missing level transmitter root valves for the cold leg accumulator. The NRC closed violation 84-35-01 in report 85-26, (Reference 3).

5. Completion Status - Based on completion of SQN corrective actions and closure of the NRC violation, this SWEC concern is closed.

B. A02850103007-002, Inadequate Fuel Handling Procedure

1. Background - During a review of Fuel Handling Instruction, (FHI)-7, "Refueling Operation," the inspector questioned the meaning of Precaution H of the procedure which allows interlocks on the fuel handling system to be bypassed only with the approval of and under the direct supervision of the Fuel Handling Senior Reactor Operator (SRO). SQN indicated that this applied to non-Technical Specification interlocks, except in emergencies, and required additional site management input. SQN was to review FHI-7 and make revisions as appropriate to provide:

   - clarification on which interlocks cannot be bypassed without the formal administrative controls of Technical Specification 6.8.

   - proceduralized requirements on the actions to be taken when interlocks are bypassed.

   - requirements for additional fuel transfer system checks when transferring fuel elements containing Rod Cluster Control Assembly (RCCA), since these elements have significantly less clearance with the tube flange during upender operation.

This was identified as inspector followup item 328/84-35-04.

2. Corrective Action Taken - SQN's response (Reference 5) to a related issue (Violation 84-36-01, Inadequate Implementation of FHI-7) included the scope of the IFI 84-35-04. SQN stated that equipment modifications and FHI-7 procedural change would be accomplished to improve fuel handling.

3. Verification Methodology - The SWEC concern identified for ECTG verification were stated as follows:

RIMS #	ISSUE	RIMS ITEM
A02850103007	Lack of clarification and specific requirements in fuel handling instructions had an adverse affect on refueling activities.	RIMS-002

ECTG reviewed the Sequoyah Compliance Licensing Files for internal and external correspondence related to this issue, applicable procedures, and NRC status and closure files. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis - The ECTG review of the pertinent documents indicated that the corrective actions for this concern have been completed. The NRC IFI was still open August 1986; however, the NRC closure statement (Reference 4) for the related violation 84-36-01 indicated corrective action had been satisfactorily accomplished as follows:

> The licensee has specified in fuel handling instruction . . . that all interlocks are to be checked out and functional. Also, if it is necessary to bypass an interlock, the procedure requires approval by the refueling SRO and clear documentation of the event. Further, before raising the upender, the licensee's instruction requires visual verification that the fuel assembly and any inserts will clear the transfer tube flange. The verification is done by means of an underwater TV system. The violation is considered closed.

5. Completion Status - SQN corrective actions have been completed. This SWEC concern can be closed following closure by the NRC.

III. REFERENCES

1. NRC Inspection Report Numbers 50-327/84-35 and 50-328/84-35, dated December 28, 1984, D. M. Verrelli to H. G. Parris

2. TVA Memorandum, "Response to NRC-OIE Inspection Report Numbers 50-327/84-35 and 50-328/84-35," dated January 21, 1985, R. H. Shell to J. P. O'Reilly

3. NRC Inspection Report Numbers 50-327/85-26 and 50-328/85-26, dated September 6, 1985, R. O. Walker to H. G. Brown

4. NRC Inspection Report Numbers 50-327/85-44 and 50-328/85-44, January 14, 1986, D. M. Verrelli to H. G. Parris

5. TVA Memorandum, "Sequoyah Nuclear Plant - NRC - OIE Inspection Report Number 50-328/84-36," dated February 20, 1985, from R. H. Shell to J. N. Grace

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: SWEC-SQN-19

REPORT TYPE: Sequoyah Nuclear Plant Element

REVISION NUMBER: 0

TITLE: Valve Checklist; Fuel Handling Instruction

REASON FOR REVISION: N/A

SWEC SUMMARY STATEMENT: The items in this report were identified by the Nuclear Regulatory Commission (NRC) and were included in the Stone & Webster Engineering Corporation (SWEC) systematic analysis. All items evaluated within this report were verified to be adequately addressed and SWEC concern A02850103007-001 was closed by NRC. Concern A02850103007-002 is now ready for closure.

PREPARATION

PREPARED BY:

K. R. Gass — SIGNATURE — 11-12-86 — DATE

REVIEWS

PEER:

John Knightly — SIGNATURE — 11/12/86 — DATE

TAS:

RRR D.W. Stewart — SIGNATURE — 11/17/86 — DATE

CONCURRENCES

		CEG-H: A.W. Debbage	11/12/86
		SRP: James R Russell	11-15-86
SIGNATURE	DATE	SIGNATURE*	DATE

APPROVED BY:

M.W. Rudolph — ECSP MANAGER — 11-17-86 — DATE

N/A — MANAGER OF NUCLEAR POWER CONCURRENCE (FINAL REPORT ONLY) — DATE

*SRP Secretary's signature denotes SRP concurrences are in files.

2242T