



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
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ATLANTA, GEORGIA 30303-1257

June 4, 2013

EA-13-023
EA-13-045

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

SUBJECT: SEQUOYAH NUCLEAR PLANT - FINAL SIGNIFICANCE DETERMINATION OF WHITE FINDINGS, NOTICES OF VIOLATIONS, AND ASSESSMENT FOLLOW-UP LETTER: NRC INSPECTION REPORT NO. 05000327/2013011, 05000328/2013011

Dear Mr. Shea:

This letter provides the final significance determination of the preliminary Yellow finding and preliminary Greater Than Green finding discussed in our previous communications dated March 12 and 18, 2013, which were included in NRC Inspection Reports 05000327,328/2013009 and 05000327,328/2013010 as Apparent Violations (AVs). The preliminary findings were previously characterized as follows:

The first preliminary Yellow finding (AV 05000327,328/2013009-01) involved the failure to properly establish an adequate abnormal operating procedure (AOP) to mitigate the impact of a probable maximum flood (PMF). The PMF is the design basis flood that may be expected from the most severe combination of critical meteorological and hydrologic conditions that are reasonably possible in a particular drainage area. Specifically, prior to September 30, 2009, AOP-N.03, "External Flooding," was inadequate to mitigate the effects of a PMF event, in that, earthen dams located upstream of the facility could potentially overtop, causing a subsequent breach. Failure of the earthen dams during a PMF event would have resulted in onsite flooding and subsequent submergence of critical equipment, such as the emergency diesel generators, resulting in an ineffective flood mitigation strategy for these PMF events. An Apparent Violation (AV 05000390/ 2013009-02) associated with this first finding was also identified regarding the failure to report an unanalyzed condition in accordance with 10 CFR 50.72.

The second preliminary Greater Than Green finding (AV 05000327,328/2013010-01) involved the failure to translate the design basis related to onsite flooding protection into specifications, drawings, procedures, and instructions. Specifically, Sequoyah's existing design documentation, including current licensing documents and configuration controlled drawings for the Essential Raw Cooling Water (ERCW) pumping station, did not contain sufficient information to identify the penetrations seals as flood barriers to prevent flood water from entering the

building during design basis flood (DBF) events. The ERCW intake station is required to remain dry during flood mode operations. Portions of the ERCW walls and penetrations are relied upon to withstand all static and dynamic forces imposed by the DBF. As a result of degraded or missing flood penetration seals, the ERCW pump station would not have remained functional when subjected to the design basis PMF and other less severe flooding events. Flooding of the ERCW Pumping Station would have resulted in submerging service water equipment relied on during DBF events which would have compromised the function of the Emergency Diesel Generators (EDGs). Failure of the EDGs would have resulted in an ineffective flood mitigation strategy to prevent core damage. The risk significance of this finding was based on postulated credible flooding events.

For both of these issues, there are no current immediate safety concerns because compensatory measures have been established to address these degraded conditions.

At your request, a Regulatory Conference was held on April 22, 2013, to discuss your views on these issues. A copy of the slide presentation made by Tennessee Valley Authority (TVA) was included in the meeting summary issued on April 23, 2013 (ADAMS Accession number ML13115A020). During the meeting your staff described your assessment of the significance of the findings, and the corrective actions taken to resolve them, including the root cause evaluation of the findings.

For the first finding (AV 05000390/2012009-01), Inadequate Abnormal Condition Procedure for Flood Mitigation Strategy Prior to Installation of HESCO Barriers, TVA provided additional information which indicated that in using point-precipitation values to approximate the frequency of a certain rainfall event to a larger area, an "areal-reduction factor" should be used for Probable Maximum Precipitation estimates (i.e., the approximated maximum estimated depth of precipitation for a given duration, drainage area, and time of year assumed reasonably possible). This factor was only qualitatively considered by the NRC during the preliminary assessment of this issue. Following the Regulatory Conference, the NRC applied various areal-reduction factors (dependent on the storm size of concern). Specifically, the NRC determined that it would be appropriate to review the total rainfall over all the areas that might affect flooding levels at the plant rather than rainfall at a particular point. The total rainfall necessary to achieve various flooding levels increased and correspondingly, this indicated an expectation of a decrease in the overall risk results. In addition, the NRC added the effect of rainfall events less intense than the PMP event not previously assumed, which could have still overtopped the earthen dams. Application of these factors allowed for increased accuracy in the frequency estimates for the involved flooding events. With respect to the net effect on risk for this finding, the NRC has concluded that the finding should be reduced one order of magnitude and, is appropriately characterized as White, an issue of low to moderate safety significance.

In accordance with NRC Inspection Manual Chapter 0305, Operating Reactor Assessment Program, for old design issues, this finding was evaluated for a determination of whether it should be treated as an old design issue. The NRC concluded that this finding will not be treated as an old design issue for several reasons. First, the NRC determined that this issue will not be treated as an old design issue since it was not licensee-identified as a result of a voluntary initiative, rather the NRC considered it was identified as a result of corrective actions from another NRC violation. In February 2008, NRC performed a quality assurance (QA) inspection of the flood-related combined operating license application (COLA) submittal information for Bellefonte Nuclear Plant (BLN) Units 3 and 4. In the course of the QA inspection,

NRC reviewed a 1998 calculation performed for the TVA operating units to evaluate the effects of physical changes resulting from the National Dam Safety program to the reservoir system on the plant design basis flood calculations. NRC identified that the 1998 calculation did not meet the TVA procedural requirement in place at that time for verification of inputs. A Notice of Violation (NOV) was issued on March 19, 2008, against the BLN 3 and 4 COLA submittal for that plant's use of the 1998 calculation. As part of TVA's response to the violation, a flow coefficient error was identified. Had the NRC not identified the BLN violation, the flow coefficient error which resulted in the performance deficiency may not have been found. The performance deficiency was not identified as part of a licensee voluntary initiative and, therefore, old design issue credit cannot be given.

An additional basis for not treating this finding as an old design issue is that it reasonably should have been identified through previous licensee activities. Specifically, TVA had other opportunities to identify this issue, beginning with the 1998 Dam Safety Program Review. TVA changed their licensing basis as a result of this review and lowered their PMF levels. This was an opportunity to previously identify the finding based on the detailed reviews necessary to modify design basis PMF levels.

The finding was also considered to reflect some aspects of current performance associated with existing licensee programs, policies, or procedures related to flood mitigation. Specifically, in 2009, when TVA installed the temporary flood barriers on upstream earthen dams as a corrective action to prevent the physical overtopping of earthen dams, TVA failed to sufficiently follow through on several key aspects of the corrective actions associated with identifying the incorrect flow coefficients. These included not analyzing the effects of the potential for earthen dam breach, not reporting the issue as an unanalyzed condition, and not clearly portraying the reliance of the temporary barriers in their operability and design documentation. This resulted in TVA's failure to analyze the significance of an upstream earthen dam failure not previously assumed for a number of years until prompted by the NRC. The failure to analyze the effects of an earthen dam failure on the site PMF level resulted in an unclear characterization of the relationship between the HESCO barriers and the design basis of the plant. This impacted the NRC's ability to effectively inspect and verify compliance in this area and was a primary consideration in the NRC's issuance of the Confirmatory Action Letter (CAL) dated June 25, 2012, which addressed concerns with TVA's licensing basis. Thus, the performance deficiency was and remained associated with the current existing licensee design basis program.

The NRC also has determined that this finding, specifically the failure to properly establish an adequate abnormal operating procedure (AOP) to mitigate the impact of a probable maximum flood (PMF), is a violation of Technical Specification (TS) 6.8.1, "Procedures and Programs," as cited in the attached Notice of Violation (Notice). The circumstances surrounding the violation were described in detail in inspection report 05000327, 328/2013009. In accordance with the NRC Enforcement Policy, the Notice is considered escalated enforcement action because it is associated with a White finding.

For the second finding (AV 05000327,328/2013010-01), TVA indicated that in using point-precipitation values to approximate the frequency of a certain rainfall event to a larger area, an "areal-reduction factor" should be used as described previously. Further TVA asserted that flood flow frequency calculations would show an order of magnitude lower probability for floods reaching the ERCW strainers. Following the Regulatory Conference, the NRC performed the following calculations:

- Frequency of floods that could exceed 698 feet above Mean Sea Level (MSL) at the ERCW Building (i.e., the elevation at which impact to strainer motors resulting in a loss of the ERCW system is assumed to take place due to water ingress via the missing flood seals) was calculated and resulted in a 2E-4/year initiating event.
- Credit was removed for RCP seal LOCA factor because core damage will ultimately occur for a total loss of heat removal.
- The non-recovery of the strainers was assumed to be 1.0 given the extreme flooding which would be expected in such events.
- Additional credit was given representing recovery of electrical power either through a) SBO-EDG, or b) offsite power restoration.
- Additional site walkdowns at the Sequoyah plant re-verified that there was no affected equipment below 698 feet level.

Prior to the Regulatory Conference, the NRC characterized the ERCW Building Penetration issue as Greater Than Green. Subsequently, the NRC has determined the finding is appropriately characterized as White, an issue of low to moderate safety significance.

In accordance with NRC Inspection Manual Chapter 0305, Operating Reactor Assessment Program, for old design issues, this finding was evaluated to determine if it should be treated as an old design issue. The NRC concluded that this finding does not meet criteria for consideration as an old design issue. Specifically, issues associated with inadequate or untimely corrective action are not eligible for treatment as old design issues. NRC Inspection Report 05000327,328/2013-002 documented a Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, that is associated with three examples of the licensee's failure to promptly identify and correct conditions adverse to quality. Two of the three examples represented untimely corrective actions related to the inadequate ERCW building penetrations seals and, therefore, this finding cannot be treated as an old design issue.

An additional basis for not treating this finding as an old design issue is that it reflects a current performance deficiency associated with existing licensee programs, policies, or procedures. Specifically, the licensee has not had a comprehensive design basis document that fully addresses external flooding protection for the ERCW building. As a corrective action, the licensee has committed to develop this design basis document as indicated during the April 22, 2013, Regulatory Conference (ML13115A020).

The fact that identification of the finding was not based on a voluntary initiative is a final consideration for not treating it as an old design issue. Although the NRC gave the licensee identification credit, (NRC Inspection Report 05000327,328/2013-010) this issue was discovered while the licensee was performing flooding walkdowns in response to the letters sent to all licensees on March 12, 2012, subject "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force (NTTF) Review of Insights from the Fukushima Dai-Ichi Accident," (ADAMS Accession No. ML12053A340). This letter compelled TVA to conduct these flood walkdowns and, therefore, was not solely a voluntary initiative.

The NRC has also determined that the failure to establish measures to assure that applicable regulatory requirements and the design basis as specified in the license are correctly translated into specifications, drawings, procedures, and instructions is a violation of 10 CFR 50, Appendix

B, Criterion III, "Design Control," as cited in the attached Notice of Violation (Notice). The circumstances surrounding the violation were described in detail in NRC Inspection Report 05000327,328/2013-010. In accordance with the NRC Enforcement Policy, the Notice is considered escalated enforcement action because it is associated with a White finding.

You have 30 calendar days from the date of this letter to appeal the staff's determination of significance for the identified White findings. Such appeals will be considered to have merit only if they meet the criteria given in the Inspection Manual Chapter (IMC) 0609, Attachment 2. An appeal must be sent in writing to the Regional Administrator, Region II, 245 Peachtree Center Avenue NE, Suite 1200, Atlanta, Georgia 30303-1257.

Based on the information developed during the inspection associated with the first issue previously described (AV 05000327,328/2013009-01) and the information provided at the conference, the NRC has concluded that an additional violation of NRC requirements occurred (AV 05000327,328/2013009-02). Specifically, the NRC determined that the failure to report within eight hours of occurrence (discovery) an unanalyzed condition that significantly degraded plant safety constitutes a violation of 10 CFR 50.72(b)(3)(ii)(B). The violation, the significance of which was evaluated using the NRC's traditional enforcement process, is cited in the enclosed Notice and the circumstances surrounding it were described in detail in NRC Inspection Report 05000327,328/2013009.

As discussed in the Enforcement Policy, the severity level of a violation involving the failure to make a required report to the NRC will be based upon the significance of and the circumstances surrounding the matter that should have been reported. In this case, and as discussed above, the NRC concluded that the failure to provide the required report is associated with a White finding associated with TVA's failure to establish an adequate abnormal operating procedure (AOP) to mitigate the impact of a probable maximum flood (PMF). In addition, TVA's failure to report an unanalyzed condition that significantly degraded plant safety, as required by 10 CFR 50.72, impeded the NRC's regulatory process. Had TVA reported the incident as required, NRC review and follow-up inspection likely would have occurred, which may have prompted TVA to adopt compensatory measures and/or corrective actions, thereby precluding further incidents. Based on the above, the NRC has concluded that the violation of 10 CFR 50.72 is appropriately characterized at Severity Level III, in accordance with the NRC Enforcement Policy.

Because your facility has not been the subject of escalated enforcement actions within the last two years, the NRC considered whether credit was warranted for Corrective Action in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. In response to the inspection findings of March 12 and 18, 2013, the Sequoyah staff promptly initiated problem evaluation reports (PERs) 669443 and 682202, conducted an extent of condition review of past instances where its flood mitigation strategies may not have been adequate, and included the reportability aspect as part of an overall Root Cause Analysis. TVA's Root Cause Analysis concluded that the cause of the reportability issues could be attributed, in part, to multiple inadequate procedures regarding reportability of unanalyzed conditions and a cultural bias towards not reporting issues that are not fully analyzed. Based on this review, you revised procedures to include guidance on conservative decision-making for reporting, conducted reportability training for key organizations, and developed a structured oversight program to assess reportability decisions. Based on the promptness of corrective actions, the procedural revision and the Root Cause Analysis, the NRC has concluded that credit is warranted for the factor of Corrective Action. Therefore, to encourage prompt and

comprehensive correction of violations, and in recognition of the absence of previous escalated enforcement action, I have been authorized, after consultation with the Director, Office of Enforcement, to propose that no civil penalty be assessed in this case. However, significant violations in the future could result in a civil penalty.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also include a determination regarding whether further enforcement action is necessary to ensure compliance with regulatory requirements.

Because plant performance for these issues has been determined to be beyond the licensee response column, we have used the NRC's Action Matrix to determine the most appropriate NRC response for this event. As a result of our assessment review, we have assessed Sequoyah's performance to be in the Degraded Cornerstone Column of the NRC's Action Matrix beginning in the first quarter of calendar year 2013.

We will conduct a supplemental inspection (Inspection Procedure 95002) when you have notified us of your readiness for the NRC to review the actions taken to address these issues. This inspection will review the inspection findings issued in this final significance determination letter.

The 95002 inspection will provide assurance that the root and contributing causes of the risk-significant performance issues are understood, independently assess and provide assurance that the extent of condition and the extent of cause of the risk-significant performance issues are identified. In addition, it will determine if safety culture components caused or significantly contributed to the risk-significant performance issues and provide assurance that TVA's corrective actions for risk-significant performance issues are sufficient to address the root and contributing causes and prevent recurrence.

For administrative purposes, this letter is issued as NRC IR 05000327,328/2013011. Accordingly, consistent with the regulatory positions described in this letter AV 05000327,328/2013009-01 is updated as VIO 05000327,328/2013009-01 with no cross-cutting aspect, AV 05000327,328/2013009-02 is updated as VIO 05000327,328/2013009-02 with no cross-cutting aspect, and AV 05000327,328/2013010-01 is updated as VIO 05000327,328/2013010-01 with a cross-cutting aspect in the area of Human Performance.

J. Shea

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Victor M. McCree
Regional Administrator

Docket Nos.: 50-327, 50-328
License Nos.: DPR-77, DPR-79

Enclosures:

1. Notice of Violation EA-13-023
2. Notice of Violation EA-13-045

cc w/encl: (See page 8)

J. Shea

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Victor M. McCree
Regional Administrator

Docket Nos.: 50-327, 50-328
License Nos.: DPR-77, DPR-79

Enclosures:

1. Notice of Violation EA-13-023
2. Notice of Violation EA-13-045

cc w/encl: (See page 8)

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J. Shea

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cc w.encls:

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Letter to Joseph W. Shea from Victor M. McCree dated June 4, 2013

SUBJECT: SEQUOYAH NUCLEAR PLANT - FINAL SIGNIFICANCE DETERMINATION OF WHITE FINDINGS, NOTICES OF VIOLATIONS, AND ASSESSMENT FOLLOW-UP LETTER: NRC INSPECTION REPORT NO. 05000327/2013011, 05000328/2013011

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NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah Nuclear Plant
Units 1 and 2

Docket No. 50-327/328
License Nos.: DPR-77/79
EA-13-023

During an NRC inspection completed on February 15, 2013, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. Technical Specification 6.8.1, "Procedures and Programs," requires in part that written procedures shall be established, implemented, and maintained covering the activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Regulatory Guide 1.33, Revision 2, Appendix A, includes "Abnormal Conditions" as a typical safety-related activity that should be covered by written procedures.

Abnormal operating procedure AOP-N.03, "External Flooding," Revision 29, provides detailed instructions for implementing required site flood mitigation strategies necessary to cope with design basis flooding events.

Contrary to the above, prior to September 30, 2009, the licensee failed to establish an adequate Abnormal Condition Procedure to implement its flood mitigation strategy. Specifically, AOP-N.03, "External Flooding," was inadequate to mitigate the effects of a Probable Maximum Flood (PMF) event, in that earthen dams located upstream of the facility could potentially overtop, causing a subsequent breach. Failure of the earthen dams during a PMF event would have resulted in onsite flooding and subsequent submergence of critical equipment, such as the Emergency Diesel Generators, resulting in an ineffective flood mitigation strategy for these PMF events.

This violation is associated with a White Significance Determination Process (SDP) finding.

- B. 10 CFR 50.72(b)(3)(ii)(B) states that a licensee shall notify the NRC as soon as practical and in all cases within eight hours of the occurrence of the nuclear plant being in an unanalyzed condition that significantly degraded plant safety.

Contrary to the above, on December 30, 2009, the licensee failed to report within eight hours an unanalyzed condition that significantly degraded plant safety for the Sequoyah facility. Specifically, the licensee failed to notify the NRC upon confirmation that a postulated Probable Maximum Flood (PMF) level would exceed the current licensing basis and the design basis PMF flooding event would result in overtopping of critical earthen dam structures upstream of the Sequoyah facility. These overtopping conditions were not previously assumed in the licensing basis for the facility and represented an unanalyzed condition.

This is a Severity Level III violation (Enforcement Policy paragraph 6.9).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region 2, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; EA-13-023" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 4th day of June 2013

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah Nuclear Site
Units 1 and 2

Docket No. 50-327/328
License Nos.: DPR-77/79
EA-13-045

During an NRC inspection completed on February 28, 2013, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

- A. 10 CFR 50, Appendix B, Criterion III, "Design Control," states in part, that measures shall be established to assure that applicable regulatory requirements and the design basis as specified in the license are correctly translated into specifications, drawings, procedures, and instructions.

The Sequoyah licensing basis related to onsite flooding is specified in UFSAR Section 2.4, "Hydrologic Engineering" and states in part, that the Essential Raw Cooling Water (ERCW) Intake Station will be maintained dry during a Design Basis Flood (DBF).

UFSAR Section 2.4.2.2, "Flood Design Considerations" states, "Protective measures are taken to ensure that all safety-related systems and equipment in the ERCW pump station will remain functional when subjected to the maximum flood level."

UFSAR Section 2.4A.2.1, "Flooding of Structures" states, "Only the Reactor Building, the Diesel Generator Building (DGB), and the Essential Raw Cooling Water Intake Station will be maintained dry during the flood mode. Walls and penetrations are designed to withstand all static and dynamic forces imposed by the DBF."

Contrary to the above, prior to December 15, 2012, the licensee failed to translate the design basis related to onsite flooding into specifications, drawings, procedures, and instructions. Specifically, Sequoyah's existing design documentation including current licensing documents and configuration controlled drawings for the ERCW Pumping Station do not contain information to identify Design Basis flood barriers to prevent water from flooding the building during a design basis flood. As a result, the ERCW pump station would not remain functional when subjected to the maximum flood level, the ERCW Intake Station would not remain dry during flood mode, and portions of the ERCW walls and penetrations would not withstand all static and dynamic forces imposed by the DBF.

This violation is associated with a White Significance Determination Process (SDP) finding.

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region 2, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; EA-13-045" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken, and (4) the date when full

Enclosure 2

compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

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In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 4th day of June 2013