

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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JAN 19 1990

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

In the Matter of )  
Tennessee Valley Authority )

Docket Nos. 50-327  
50-328

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2 - IMPLEMENTATION OF LONG-TERM CORE SHUTDOWN MARGIN CORRECTIVE ACTION COMMITMENTS

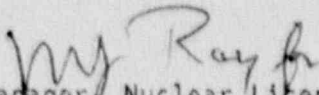
This letter responds to a request by NRC in a letter from Suzanne Black to O. D. Kingsley, Jr., dated April 14, 1989, for TVA to inform NRC when TVA has implemented the identified longer-term corrective actions and commitments. These actions were previously described in two letters to NRC dated October 5, 1988, and October 14, 1988, and also in Licensee Event Report 1-88045, Revision 1, dated January 25, 1989.

TVA has completed implementation of the subject commitments that are summarized in the attached enclosure. The commitments have been tracked to completion on SQN's corporate commitment tracking system (CCTS); closure documentation is appropriately on file for further review. Identification of additional actions resulted from completion of two of the commitments involving investigation and review efforts. These actions are described in Enclosure 1 and identified as additional commitments in Enclosure 2.

If you have any questions concerning this submittal, please telephone M. A. Cooper at (615) 843-6651.

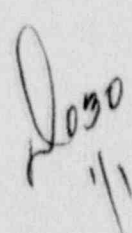
Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
Manager, Nuclear Licensing and  
Regulatory Affairs

Enclosures  
cc: See page 2

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U.S. Nuclear Regulatory Commission

JAN 19 1990

cc (Enclosures):

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ENCLOSURE 1

I. LONG-TERM CORRECTIVE ACTIONS

Incorporation of more extensive training in posttrip procedures in the annual retraining cycle for operators.

Commitment: LER 327/88045, Revision 1

"Training to licensed shift operators on the steam dump control modification and the FWI setpoint change will be included in the 1989 requalification training program."

Corrective Action: CCTS NC0880270007

Training to licensed shift operators on the steam dump control modifications and the FWI setpoint change was included in the 1989 requalification training program. This training sequence is now complete.

Commitment: LER 327/88045, Revision 1

"A posttrip cooldown scenario will be incorporated into the annual requalification training program. The shift operating crews will be formally evaluated during week one 1989 requalification training on their actions during this scenario.

Corrective Action: CCTS NC0880270008

A posttrip cooldown scenario was incorporated into the annual requalification training program. The shift operating crews were formally evaluated during Week one of the 1989 requalification training on their response to this scenario.

Commitment: Letter Dated October 5, 1988

"In addition, all licensed operators will receive training (postrestart unit 1) on AFW manual control during operator requalification training week 6. This training will be completed by December 31, 1988."

Corrective Action: CCTS NC0880159006

All licensed operators received training (postrestart Unit 1) on AFW manual control during operator requalification training Week 6. This commitment was completed on December 23, 1988.

Training instructions will monitor control room operations.

Commitment: LER 327/88045, Revision 1

"An Operations training instructor will observe MCR activity on a monthly basis to evaluate licensed and requalification operator training effectiveness. This action will continue until results indicate no further action is required."



Corrective Action: CCTS NCO880280003

Operations' training instructors observed MCR activities for three continuous months, noting good operating and communications skills were exhibited by the shift operators. No problems were identified. These observations were documented using the Nuclear Training Standard Practice TCA-100, "In-Plant Activity for Instructors with Plant Specific Technical Instructional Responsibilities," that includes an Instructor In-Plant Activity Plan.

Verify accuracy of simulator modeling.

Commitment: LER 327/88045, Revision 1

"The simulator modeling will be verified before implementation of any future posttrip/incident investigation identified corrective actions requiring simulator training."

Corrective Action: CCTS NCO880280004

SQN Training Instruction SQTO-28, "Simulator Training," has been revised to require that simulator modeling be verified before implementation of required simulator training that results from a posttrip/incident investigation. The modeling verification shall ensure the simulator fidelity is as close as possible to the actual event.

II. BROADER AREA COMMITMENTS

Commitment: Posttrip Review - LER 327/88045, Revision 1

"TVA will assess management involvement in the posttrip/incident review process and associated corrective action."

Corrective Action: CCTS NCO880280005 and NCO880159007

SQN Administrative Instruction (AI) 18, file package 18, Part B, "Reactor Trip Report," was incorporated into a new procedure AI-18.78, "Post Trip Review Report," and revised to provide further guidance and enhanced management involvement in performance of posttrip reviews. The process for investigation and reporting abnormal events has been enhanced and formalized into a separate procedure AI-18.18, "Reporting of Abnormal Events."

Commitment: LER Review - LER 327/88045

"TVA is presently conducting a review of LERs resulting from ESF actuations including reactor trips for 1988 to identify common root causes and/or insufficient corrective action."

Corrective Action: CCTS NCO 80280006

The review identified some weaknesses in the identification of interim or long-term corrective action. This reinforced the need for enhancement of the incident investigation process previously discussed. TVA will continue to monitor and trend abnormal events to assess the effectiveness of corrective actions.

Commitment 3 - Control and Review of Vendor Documents

"TVA will investigate the possibility of making the Westinghouse Electric Corporation document, 'Precautions, Limitations and Setpoints For Nuclear Steam Supply Systems,' a controlled document for SQN."

Corrective Action: CCTS NC0880159011

A task force was formed to investigate making the Precautions, Limitations and Setpoints (PLS) document a controlled document for SQN. This group concluded that the PLS document should be controlled and can be controlled by TVA. Westinghouse will provide process limit calculations to support the setpoints in the PLS document, and the PLS will be updated to reflect current plant configuration including modifications implemented during the respective Cycle 4 refueling outages. TVA will make the PLS a TVA controlled document by February 1, 1991, which is approximately two months after the Unit 2 Cycle 4 outage.

Commitment 4 - Emergency Operating Procedures Review

"TVA will review the EOP step deviation documents for inappropriate deviations from the Westinghouse Owners Group (WOG) guidelines."

Corrective Action: CCTS NC0880270002

The emergency operating procedure review has been completed, and several comments and concerns were identified. TVA discussions with Westinghouse indicated that there are no immediate actions required. Additional justifications to clarify the deviations to the step deviation document will resolve the majority of the comments. Appropriate actions will be implemented to resolve the Group 1 comments and concerns by June 1, 1990.

ENCLOSURE 2

1. The PLS will be updated to reflect current plant configuration, including modifications implemented during the respective Cycle 4 refueling outages. TVA will make the PLS a controlled document by February 1, 1991, approximately two months after Unit 2 Cycle 4.
2. Appropriate actions will be implemented to resolve the comments and concerns noted in Group 1 of the Westinghouse review of the SQN EOPs by June 1, 1990.