

400 Chestnut Street Tower II

July 6, 1981

SQRD-50-328/81-41

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region II - Suite 3100  
101 Marietta Street  
Atlanta, Georgia 30303



Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNIT 2 - FAILURE TO FULFILL COMMITMENT ON  
NCR 27P - SQRD-50-328/81-41 - FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector  
R. V. Crlenjak on June 5, 1981 in accordance with 10 CFR 50.55(e) as  
NCR SQN NEB 8128. Enclosed is our final report.

If you have any questions, please get in touch with D. L. Lambert at  
FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*[Signature]*  
L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Director (Enclosure)  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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ENCLOSURE  
SEQUOYAH NUCLEAR PLANT UNIT 2  
FAILURE TO FULFILL COMMITMENT ON NCR 27P  
SQRD-50-328/81-41  
10 CFR 50.55(e)  
FINAL REPORT

Description of Deficiency

During the recent TVA commitment control investigation, it was discovered that a commitment made by TVA in a final report to NRC-OIE (from L. M. Mills to J. P. O'Reilly dated August 25, 1980) concerning nonconformance report 27P was not completed. The seal-in contacts of all affected IX relays were not removed from the circuit breakers in the 6.9 kV shutdown board by November 3, 1980 as scheduled. The apparent cause of this failure was due to two contributing factors:

- (1) Failure to track the commitment under Engineering Design (EN DES) Engineering Procedure (EP) 2.07--This occurred because a decision was made (erroneously) not to track OIE commitments because it was believed that these commitments were being adequately tracked by separate methods in the Division of Construction (CONST).
- (2) Failure to coordinate commitment responsibilities and scheduling between offices within TVA--This is primarily due to the Office of Engineering Design and Construction (OEDC) (the organization making the commitment) not identifying the commitment to the Office of Power (POWER) (the organization responsible for implementation of the commitment).

Safety Implications

Had this condition remained uncorrected, failure to implement corrective actions as committed could have resulted in a failure to remove the seal-in contacts of the IX relays from the circuit breakers in the 6.9 kV shutdown board, creating 6.9 kV circuit breakers lockout. This condition could result in a failure of the safety injection pumps to start under emergency conditions.

Corrective Action

TVA submitted a revised final report for NRC 27P with a revised schedule for implementation of corrective actions. Commitment tracking records were prepared and transmitted to the Office of Power (to be included in their commitment tracking program) to preclude recurrence of this problem. Completion of the TVA commitment investigation program, which identified this condition, will result in previous OIE commitments not completed to date (if any) being properly tracked as per EN DES-EP 2.07. EN DES-EP 2.07 is being revised to implement a number of changes which include the following:

- (1) Expand the commitments control program to include OEDC commitments made in letters to NRC-OIE.
- (2) Provide for a method of transferring a commitment to POWER to be included in their tracking system.

This revision (Revision 4) will be issued by September 11, 1981.

Increased management emphasis has been placed on the commitment tracking (control) in OEDC. Commitments to NRC-OIE made since the identification phase of the commitment investigation are being properly tracked now and will be in the future.