TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

September 21, 1982 8:02

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE INSPECTION REPORT 50-327/82-16 AND 50-328/82-16 - RESPONSE TO VIOLATIONS

The subject OIE inspection report dated August 20, 1982 from R. C. Lewis to H. G. Parris cited TVA with two Severity Level IV violations. Enclosed is our response to each item of violation specified in the subject inspection report. The late submittal of this report was coordinated with D. R. Quick of your staff on September 20, 1982.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Licensing

Enclosure
cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ENCLOSURE

NRC INSPECTION REPORT NOS. 50-327/82-16 AND 50-328/82-16
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED AUGUST 20, 1982

Item A - 50-327, 328/82-16-01

10 CFR 50 Appendix B Criterion XVI and the accepted QA Program (TVA-TR-75-1A Revision 4) Section 17.2.16 require that measures be established to assure that conditions adverse to quality are promptly corrected.

Contrary to the above, measures have not been established to assure that sufficient management attention is provided to promptly correct conditions adverse to quality such as QA audit findings. Procedures have not been established to require that unresolved quality issues are elevated to successively higher levels of management when audit responses or corrective actions by the audited organization do not produce acceptable results. Although not a complete list, the two QA audits below are examples of problems identified over a year ago for which corrective action has not been achieved.

1. Audit OPQAA-SQ-81-1 conducted January 7-16, 1981, identified in finding A-1 that maintenance requests (MRs) were not being reviewed by the Assurance Manual. Reinspection by the QA staff in this area indicates that this problem is still recurring. Corrective action for this item was originally scheduled for completion by June 1981.

2. Audit OPQAA-SQ-81TS-04 conducted April 13-23, 1981, identified eight findings involving the Radiological Emergency Plan. The auditied organization did not respond to findings A-1, 3, 5 and 7 until the failure to respond was identified in a separate audit conducted in October 1981. As of this inspection, the corrective action for finding A-5 had not been completed.

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

1. Admission or Denial of the Alleged Violation

   TVA admits the violation.

2. The Reasons for the Violation if Admitted

   Inadequate management attention was given to the correction and/or resolution of quality assurance audit findings.

3. Corrective Steps Which Have Been Taken and the Results Achieved

   Delinquent QA&AS audit findings are being identified and brought to the attention of responsible management for resolution. This will be completed by September 30, 1982.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

   A corrective action escalation program is being developed for bringing proper management attention to delinquent audit findings. This program is in an early stage and is projected to become effective January 30, 1983.

5. The Date of Full Compliance

   TVA will be in full compliance on January 30, 1983.

Item B - (327, 328/82-16-02)

10 CFR 50 Appendix B Criterion II and the accepted QA Program (TVA-TR75-1A, Revision 4) Section 17.2.2 state that the program shall be documented by written policies, procedures or instructions and shall be carried out throughout plant life. Section 17.2.2 also states that the Office of Power Quality Assurance Manual (OQAM) contains procedures which implement the accepted QA Program. 10 CFR 50 Appendix B Criterion VI and the accepted QA Program Section 17.2.6 require that measures be established to assure that documents are used at the location where the prescribed quality activity is performed.

Contrary to the above, measures have not been established to assure that written procedures implementing the quality assurance program are used throughout plant life at the location where prescribed quality activity is performed. Managerial controls have not been established to assure that each OQAM procedure has been evaluated to determine its applicability and factored into the appropriate plant functional area. In addition, a system has not been established to assure that revisions to the OQAM are implemented.

This is Severity Level IV Violation (Supplement I).

1. Admission or Denial of the Alleged Violation

   TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

   In the past, implementation of division quality assurance (QA) requirements has been the responsibility of various plant supervisors depending on the area affected. Each plant supervisor was assigned a controlled copy of the Operational Quality Assurance Manual (OQAM) and received new and revised QA procedures as issued. The responsible supervisor identified requirement changes affecting his area and implemented the revised requirements in the appropriate plant instruction(s). Apparently in the case noted by the inspector, the revised requirements did not get implemented because of misunderstandings about who was responsible and because there was no follow-up system.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Action has been taken to resolve the specific example noted by the inspector. In this case, a request was made to revise the OQAM. We do not believe that this one example is evidence of generic deficiencies. This conclusion is supported by the fact that the Quality Assurance and Compliance Branch reviews and concurs with all new and revised administrative instructions and standard practices which implement QA program requirements before their issuance. Because of these continuing reviews, the possibility of widespread undetected noncompliance with division QA requirements is not credible.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Sequoyah Nuclear Plant's procedures are being revised to provide for:

1. evaluation of new/revised OQAM procedures to identify plant instructions affected

2. assignment of implementation responsibility to specific supervisors

3. tracking/follow-up to ensure timely implementation of revised requirements in plant instructions

5. Date When Full Compliance Will Be Achieved

The specific case noted by the inspector concerning the abnormal operating instruction format will be resolved when Part II, Section 1.1 of the OQAM is revised to allow the present format. This is expected to occur by February 26, 1983. New controls listed above will be implemented immediately. They will be described in new or revised procedures by October 29, 1982.