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Robert A. Fenech  
Vice President, Sequoyah Nuclear Plant

March 25, 1993

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) - NRC INSPECTION REPORT NOS. 50-327,  
328/93-02 - REPLY TO NOTICE OF VIOLATION (NOV) 50-327, 328/93-02-01

Enclosed is TVA's reply to Ellis Merschhoff's letter to M. O. Medford dated February 23, 1993, which transmitted the subject NOV. The violation addressed three examples involving failure to follow specific procedure requirements.

If you have any questions concerning this submittal, please telephone M. A. Cooper at (615) 843-8924.

Sincerely,

Robert A. Fenech

Enclosure  
cc: See page 2

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ENCLOSURE

RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-327/93-02 AND 50-328/93-02  
ELLIS MERSCHOFF'S LETTER TO M. O. MEDFORD  
DATED FEBRUARY 23, 1993

Violation 50-327, 328/93-02-01

"Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented and maintained for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. Appendix A to Regulatory Guide 1.33 requires administrative procedures, which include: safe operation of nuclear power plants, scheduling calibrations, and performing maintenance.

"Contrary to the above, the following specific procedures requirements were not properly implemented as described below.

- "1. Site Standard Practice SSP-6.52 Rev. 0, Activities of Customer Group at Sequoyah Nuclear Plant, requires in step 3.2.a that clearances and grounding be performed in accordance with site and Customer Group requirements. Customer Group Operating Procedure Letter No. 9 dated June 1, 1992 section 14 requires that after verifying switching orders to be correct and adequate, the operator will then perform the operations exactly in the order given, carefully observing equipment for proper operation. He will report the time for each operation, including the time that clearance tags were placed.

On January 1, 1993, during first shift, Sequoyah operators performed the required switching evolutions out of sequence.

- "2. Site Standard Practice Procedure, SSP-6.21, Maintenance Management System Initiation Of Work Requests, specifically requires that work requests be initiated for maintenance on all installed plant equipment.

On December 8, 1992, a system engineer and a non-licensed operator performed maintenance on unit 2, number 3 heater drain tank level controller, LIC-6-106, with no work request or procedure.

- "3. Site Standard Practice 6.3, Preventive Maintenance, is the administrative procedure for scheduling PM tasks, including calibrations. Section 3.12.2 of SSP-6.3 requires that if a PM task cannot be performed within the scheduled due date, including the grace period, then the responsible Systems Engineer will provide a written technical justification for rescheduling or canceling the PM task.

On or about March 1991, a technical justification was not written for deferring the calibration of the 6.9 kV shutdown board time delay relays (device LV1 and LV2) for shutdown boards 1B-B and 2B-B indefinitely. These relays were last calibrated in May 1989. As of January 22, 1993 a technical justification had not been written.

"This is a Severity Level IV Violation (Supplement 1)."

Example No. 1

Reason for the Violation

The reason for the violation was operator misunderstanding of the applicability of the requirements contained in the Customer Group (CG) Operating Procedure Letter No. 9. In performance of the work, the operator followed the switching-order sequence for the eight steps that were critical to equipment operation and personnel safety. However, the remaining steps (approximately 13) were performed in the sequence logic dictated by the physical location of equipment in the plant. For these steps, the breaker and/or switch position only required verification that the breaker and/or switch was in the open position and placement of the appropriate clearance tag.

Corrective Steps That Have Been Taken and the Results Achieved

The methodology for conducting switchyard operations has been overhauled. A Generating Group standard has been written that provides switching-order sequence requirements for site Operations personnel and will be incorporated into site procedures. In the interim, Operations personnel have been instructed on the requirements to follow switching-order sequence through an Operations standing order. Switching orders are now routinely received in writing from the CG, acknowledged when understood, and conducted step-by-step.

The Corrective Steps That Will be Taken to Avoid Further Violation

No additional actions are necessary.

Date When Full Compliance Will be Achieved

TVA is in full compliance.

Example No. 2

Reason for the Violation

The reason for the violation was a lack of understanding of the scope of activities that can be performed without a work document. Operations is allowed to adjust the setpoint of non-safety-related pneumatic controllers. However, the frequent adjustment required of the No. 3 heater drain tank (HDT) level controllers should have been accomplished with a work document. As a result of not identifying this instrument drift, the problem with the level controller continued, unknown to plant management.

When the system engineer was contacted by Operations to evaluate the problem with the high level in the No. 3 HDT, the need to dial the setpoint to lower the level was discussed with the Unit 2 assistant shift operations supervisor. The system engineer was instructed to coordinate activities with the turbine building assistant unit operator (TBAUO)

before performing any adjustments, but there was no discussion of the need for a work request (WR). No WR had been written for this problem, and no periodic instruction exists for this adjustment. In addition to adjusting the level-controller setpoint dial, the system engineer depressed the clean-out plug to clean the metering orifice. This action was incorrectly taken as an extension of the adjustment of the controller setpoint dial. The system engineer and the TBAUD mutually agreed on this action.

#### Corrective Steps That Have Been Taken and the Results Achieved

Plant personnel are not allowed to use the metering orifice clean-out plug without a WR. This has been communicated to the Operations, Technical Support, and Instrument Maintenance personnel.

Adjustment of the setpoint dial on non-safety-related pneumatic controllers by Operations personnel in cases requiring prompt action is acceptable. However, adjustment for equipment performance optimization, by Operations personnel, will be accomplished with the appropriate system engineer during walkdowns of plant equipment. This will provide the system engineer trending information that can be used to determine equipment maintenance needs and initiation of the appropriate work documents.

Actions, other than setpoint dial adjustment, are to be performed by use of the appropriate work document.

These management expectations will be formalized and communicated to the appropriate Operations, Maintenance, and Technical Support personnel.

#### Corrective Steps That Will be Taken to Avoid Further Violations

No additional actions are necessary.

#### Date When Full Compliance Will be Achieved

TVA is in full compliance.

#### Example 3

##### Reason for the Violation

The reason for the violation was insufficient management oversight of the preventive maintenance (PM) process. Management did not ensure that the issues associated with delinquent PMs were escalated to appropriate management levels for resolution. A contributing factor to the violation was a lack of communication between the involved organizations (Operations, Maintenance, and Technical Support). The individuals involved did not ensure that each of the other responsible organizations understood the specific requirements associated with the deferral of delinquent PMs.

#### Corrective Steps That have Been Taken and the Results Achieved

The delinquent PMs associated with the 80 percent undervoltage time-delay relays were evaluated, and appropriate technical justifications were developed for extension of PM performance. The PMs were later performed within the timeframe provided by the approved extensions. The delinquent PM list for PMs that were initiated as a result of a commitment (commitment to NRC, INPO, or internal source) was reviewed. PMs that were past the scheduled performance period were either performed or technical justifications were developed.

The site has increased sensitivity to delinquent PMs with the intent to perform PMs within the scheduled performance period. The Maintenance Manager reviews the delinquent PM list and discusses the PM status with the appropriate department managers on a weekly basis. The Site Vice President will be provided information on PMs past their due date and delinquent PMs (past their late date) on a monthly basis. The governing administrative procedure will be revised to require that an operability evaluation be performed for PMs exceeding their late date.

A programmatic review was performed to ensure that the PM classification scheme and the controls in place are appropriate. The PM classification scheme was determined acceptable. PMs that were initiated as a result of environmental qualification requirements or commitments and require deferral are being presented to the Site Vice President for review to increase management oversight.

A team, composed of representatives from Maintenance, Technical Support, and Operations, is currently reviewing the PM schedule and implementation process. Recommendations developed as a result of the review will be incorporated as determined appropriate.

#### Corrective Steps That Will be Taken to Avoid Further Violations

No additional actions are necessary.

#### Date When Full Compliance Will be Achieved

TVA is in full compliance.

#### Commitments for Violation 50-327, 328/93-02-01

1. Incorporate the Generating Group standard that provides guidance on switching-order sequence requirements into a site procedure by June 4, 1993.
2. Formalize the management expectation related to controller adjustments and use of the work control process and communicate this expectation to the appropriate Operations, Maintenance, and Technical Support personnel by April 30, 1993.
3. The governing administrative procedure (for PMs) will be revised by May 14, 1993, to require an operability evaluation for PMs exceeding the late date.