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TENNESSEE VALLEY AUTHORITY

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JUL 02 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) - REVISION OF THE COMPLETION DATE FOR THE Q-LIST

This letter provides the status of the Q-list development at SQN and revises the completion date for this effort.

TVA committed to develop a Q-list as an enhancement to existing processes, specifically Sequoyah Standard Practice SQA134, "Critical Structures, Systems and Components (CSSC) List." In April 1989, TVA committed to have systems selected and components classified with data sheets prepared, and to have the Q-list issued and incorporated in controlled binders by January 30, 1990. SQN has made significant progress toward the accomplishment of this commitment; however, the January 30, 1990, completion date could not be achieved. It was determined in January 1990 that it would take an additional six weeks to complete the classification of the remaining components, the interface review, and the concurrence process. This status was discussed with the NRC senior resident inspector at that time. TVA completed the classification of the components and development of a list of these components on March 20, 1990. However during the review and concurrence process, potential problems were identified affecting implementation and commitment closure.

The first major problem affects implementation and involves component overclassification. During the interface review and approval process of the components on the Q-list, it was determined that overclassification of a number of components had occurred. The overclassification was the result of the mechanistic-based classification process that was used in lieu of a functional-based classification process, for establishing a complete list of safety-related components for the Q-list (e.g., all components associated with TVA Class A, B, C, or D piping and all components receiving 1E power were classified as safety-related regardless of function). TVA recognized that the mechanistic-based classification process would result in some overclassification of components; however, when the decision was made in 1988, the overclassification was not expected to have such a significant impact. This overclassification resulted in needlessly changing many designations of components from nonsafety-related to safety-related; therefore causing changes in the documentation requirements such that routine maintenance activities

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would have to be replanned to incorporate additional requirements (e.g., materials, paperwork, and hold points). Under closer review, it was determined that the impact on maintenance activities would have been significant and unnecessary. Functional reviews will be necessary to determine appropriate declassification.

The second major problem affects commitment closure, and involves the categorization of components field-installed since the initial classification effort. In September 1988, the Q-list was baselined. Since then, TVA has implemented a significant number of modifications including the modifications for the Unit 2 Cycle 3 and the Unit 1 Cycle 4 refueling outages. A mechanism did not exist to incorporate review of these modifications back into the ongoing baseline classification effort. Procedures are being established to provide for future maintenance and updating of the Q-list. Evaluation of design changes implemented since the initial baseline, up to the date of issuance of the aforementioned procedures, is considered necessary prior to closure of the commitment.

In summary, implementation of the Q-list "as is" would cause unnecessary and costly delays in replanning maintenance, modification, outage-related activities, and associated unnecessary revision of procedures. Additionally, TVA considers evaluation and incorporation of past modifications, since the baseline, necessary to close the commitment. TVA will resolve both the overclassification issue and the categorization of design changes that have been field-completed since the September 1988 baseline. The resultant Q-list will be implemented by January 4, 1991. The revised completion date for the Q-list commitment is contained in the enclosure.

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

Very truly yours

TENNESSEE VALLEY AUTHORITY

Mark O. Medford

Mark O. Medford, Vice President
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Enclosure
cc: See Page 3

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cc (Enclosure):

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ENCLOSURE

Commitment

The Q-list will be issued and implemented by January 4, 1991.