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Robert A. Fenech  
Vice President, Sequoyah Nuclear Plant

October 5, 1993

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

Gentlemen:

In the Matter of	)	Docket Nos. 50-327
Tennessee Valley Authority	)	50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327,  
328/93-09 - REVISED REPLY TO NOTICE OF VIOLATION (NOV) 50-327,  
328/93-09-01 AND -03

Enclosed is TVA's revised response to Paul E. Fredrickson's letter to Mark O. Medford dated April 22, 1993, which transmitted the subject NOV. The subject letter contained two violations. The first violation is associated with several components that were not configured properly. The second violation is associated with numerous safety-related instruments that were not calibrated as the result of an inadequate surveillance instruction deferral process.

This revision provides additional information and revised corrective actions concerning the first violation. Those areas revised are noted with revision bars.

Part of the condition associated with the first violation was previously reported in accordance with 10 CFR 50.73 by Licensee Event Report (LER) 50-328/93002, Revision 1, dated August 25, 1993. Commitments associated with that violation are contained within the LER revision. Enclosure 2 of this submittal contains commitments associated with the second violation.

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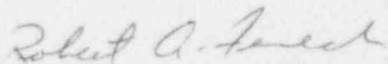
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If you have any questions concerning this submittal, please telephone  
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Sincerely,



Robert A. Fenech

Enclosures

cc (Enclosures):

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ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-327/93-09 AND 50-328/93-09  
PAUL E. FREDRICKSON'S LETTER TO MARK O. MEDFORD  
DATED APRIL 22, 1993

Violation 50-327, 328/93-09-01

"A. 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.

Site Standard Practice SSP-12.2, SYSTEM AND EQUIPMENT CONTROL, Rev. 1, requires that all safety-related systems and equipment required to be operable shall be included in the configuration control scope with the associated checklists listed in Attachments 1 - 6 as applicable.

Contrary to the above, during the period of March 19 through March 26, 1993, operators determined that seven safety-related valves and two safety-related power fuses were not configured as required by checklists identified in SSP-12.2.

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

Reason for the Violation

The cause of this violation could not be explicitly determined. The investigation of this event identified several possible causes (listed below) for the devices being misconfigured. While it could not be determined which of the following causes resulted in the given conditions, corrective actions are being taken to address each of the causes.

Relative to the valves not being secured:

1. Procedure/drawing inadequacies and inconsistencies existed. The valve alignment checklists required the valves to be closed and capped, while the "Verification of Containment Integrity" surveillance instruction (SI) required the valves to be locked, closed, and capped. The valve alignment checklists were being performed during the same timeframe as the containment integrity verification SI. The valve alignment checklist may have been performed subsequent to the containment integrity verification SI for the subject valves. Since the valve alignment checklist did not require the valves to be locked, the locks may have been removed after the containment integrity verification SI was completed. This seems to be the most plausible explanation; however, failure to further investigate this type of disagreement between the procedure and the as-found component configuration represents a lack of

appropriate sensitivity to configuration management issues. It was also determined that the associated plant drawings do not indicate the locked closed requirement for these and similar valves that are required to be locked closed.

2. The containment integrity verification SI may have been incorrectly performed, leaving the valves unlocked.

Relative to the valves found open:

1. The valves may have been inadvertently manipulated or bumped open. It should be noted that these are T-handle valves.
2. SIs or valve checklist instructions may have been improperly performed.

Relative to the fuses found in the wrong position:

The power availability checklist instruction was improperly performed.

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

The subject valves have been placed in the correct position with locking devices installed, as appropriate. The subject fuses were also placed in the correct position.

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

The following corrective actions are being taken to address potential causes.

1. Procedures that manipulate valves, breaker positions, or fuse removal, etc., will be reviewed to ensure that configurations for common components are consistent. Procedures that require revisions as the result of the review mentioned above will be revised before their use, supporting restart of the respective units from the current outages.
2. Nuclear Engineering (NE) will revise the appropriate engineering drawings to remove all references to locked/secured valves.
3. A systematic verification of the configuration of required components will be performed on each unit. Primary and secondary process system components will be verified to be correctly configured before restart of their respective units.
4. A more positive method of locking T-handle valves will be developed.
5. To minimize the potential for inadvertent valve manipulation, e.g., bumping, the sequence for containment closeout and containment integrity verification closeout will be revised. Containment integrity verification will be performed sufficiently late in the schedule (as near as practicable to the administrative closure of containment).

6. Management's expectations regarding the initiation of the appropriate corrective action document on finding components in other than expected configurations will be communicated to Operations personnel.
7. Extensive actions are ongoing to strengthen the Sequoyah configuration control process and implementation including: clear definition of expectations and ownership for Operations personnel; verification process and training upgrades; procedure and drawing reviews/revisions to ensure correct component configuration; additional training on consistent methods for verifying various types of components; and plant/design review to ensure that plant components requiring configuration control are captured in procedures.
8. SQN has developed a procedure that will be used to control all secured valves. This procedure encompasses those valves that NE has identified as being required to be secured as the result of design basis conditions. The procedure also contains those valves that plant operations has identified as being administratively required to be secured.

Date When Full Compliance Will be Achieved

TVA is in full compliance with the specific violation. Additional corrective actions are being taken to strengthen performance in the area of overall configuration control.

Violation 327, 328/93-09-03

"B. 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 the calibration of safety-related instruments.

Site Standard Practice SSP-8.2, SURVEILLANCE TEST PROGRAM, Rev. 0, requires that surveillance instructions be performed at scheduled intervals specified in the surveillance instruction. The SSP also provided a method for deferral of surveillance instructions.

Contrary to the above, on March 30, 1993, more than 50 safety-related instrument calibrations were identified as having not been performed as required by their respective surveillance instructions due to use of an inappropriate process for deferral of performance of the surveillance instructions for the instrument calibrations.

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

#### Reason for the Violation

The cause of this event was an inadequate deferral process for SIs that did not satisfy technical specification (TS) surveillance requirements, i.e., non-TS SIs. The procedure that was utilized to defer non-TS SIs failed to require a technical evaluation in order to delay performance of these procedures. This resulted in numerous safety-related instruments not being calibrated within the timeframes specified by the non-TS SIs and no technical justification for the deferral.

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

A list of components with delinquent calibrations has been developed. Instrument Maintenance is presently calibrating these components based on the priority established by Technical Support.

The procedure utilized to defer non-TS SIs has been revised to require a technical evaluation before a non-TS SI may be deferred.

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

Components with delinquent calibrations that are safety-related, compliance, or postaccident monitoring instruments will either be calibrated or have a technical evaluation to justify deferral before restart of the respective units from the current outages.

All late non-TS SIs will either be performed or have a technical evaluation to justify deferral of the procedure before restart of the respective units from the current outages.

#### Date When Full Compliance Will be Achieved

TVA will be in full compliance with the violation before restart of the respective units from the current outages.

ENCLOSURE 2

\* Commitments

1. Components with delinquent calibrations that are safety-related, compliance, or postaccident monitoring instruments will either be calibrated or have a technical evaluation to justify deferral before restart of the respective units from the current outages.
2. All late non-TS SIs will either be performed or have a technical evaluation to justify deferral of the procedure before restart of the respective units from the current outages.