



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

December 22, 1994

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) - INSPECTION REPORT NOS. 50-327, 328/94-34 -
REPLY TO NOTICE OF VIOLATION (NOV) 50-327, 328/94-34-01

Enclosure 1 contains TVA's reply to Mark S. Lesser's letter to Oliver D. Kingsley, Jr., dated November 29, 1994, which transmitted the subject NOV. The violation is associated with the failure to implement procedures and/or have adequate procedures as required by 10 CFR 50, Appendix B, Criterion V, which requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings such that the activity can be accomplished in accordance with these instructions, procedures, or drawings. During the implementation of a scheduled maintenance activity on the electrical distribution equipment, several delays occurred, resulting in exceeding the Limiting Condition for Operation (LCO) timeframe. Discretionary enforcement of LCO 3.8.2.1.b to exceed the 24-hour action statement was requested and granted. The delays involved the testing of a wrong breaker and incorrect vendor and TVA drawings. A list of commitments is included in Enclosure 2.

If you have any questions concerning this submittal, please telephone J. W. Proffitt at (615) 843-6651.

Sincerely,

R. J. Adney
Site Vice President

Enclosure
cc: See page 2

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cc (Enclosure):

Mr. D. E. LaBarge, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852-2739

NRC Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy-Daisy, Tennessee 37379-3624

Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323-2711

ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327, 328/94-34
MARK S. LESSER'S LETTER TO OLIVER D. KINGSLEY, JR.
DATED NOVEMBER 29, 1994

Violation 50-327, 328/94-34-01

"10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

"Contrary to the above on October 1, 1994,

1. An activity affecting quality was not accomplished in accordance with prescribed instructions in that Work Order 93-08531-00 was not followed during maintenance and testing of vital inverter 2-I. The rectifier output breaker was initially tested instead of the inverter DC input breaker which contributed to the inability to complete the work within the required technical specification action statement.
2. Instructions, procedures and drawings were inadequate in that TVA Drawing 1,2-45N700-1, vendor drawing 014D17734, vendor manual SQN-VTD-S250-0020 and Procedure SOI 0-SO-250-2 incorrectly depicted or referred to the AC output switch for vital inverter II-1 as a circuit breaker. This resulted in testing that damaged a replacement switch and contributed to the inability to complete the work within the required technical specification action statement.

"This is a severity level IV violation (Supplement I)."

Reason for the Violation

This violation is associated with the implementation of scheduled maintenance activities on plant electrical distribution equipment. The reason for the violation example associated with the testing of the wrong breaker was determined to be personnel error resulting from inadequate management involvement. The prejob brief performed by the foreman was lacking in sufficient detail for the complexity and urgency of this task. Field supervision of this task was also inadequate. The TVA drawing utilized did not provide sufficient detail in relation to circuit breaker location on the front of the inverter to positively locate the input circuit breaker. Also, the labeling nomenclature used to describe the output breaker was not consistent with each of the inverters. Therefore, the rectifier output breaker was mistakenly tested as the input breaker. The reason for the violation example associated with inadequate drawings was inadequate vendor information. The vendor failed to provide sufficient information to differentiate between the vendor's molded case switches and their molded case circuit breakers.

*Corrective Steps That Have Been Taken and the Results Achieved

Managerial requirements and supervisory techniques have been stressed to Maintenance supervision, including a review of this issue with the Maintenance department managers.

Maintenance employees have been cautioned regarding the potential problems associated with the acceptance of inadequate prejob briefings. Additionally, the appropriate Maintenance employees have been instructed on how to differentiate between the molded case circuit breaker and molded case switch.

Corrective Steps That Will be Taken to Avoid Future Violations

The appropriate plant drawings will be revised to identify the location of input and output circuit breakers. Also, the applicable plant and vendor drawings will be revised, as appropriate, to differentiate between the vendor's molded case switch and their molded case circuit breaker.

The system operating instructions for the vital inverters will be revised to use the same nomenclature for components that is actually on the labels.

The nomenclature labeling for the 120-volt alternating current vital inverter output device will be corrected.

Date When Full Compliance Will be Achieved

TVA will be in full compliance at the completion of the corrective actions scheduled to be completed by June 16, 1995.

ENCLOSURE 2

COMMITMENTS

1. The appropriate plant drawings will be revised to identify the location of input and output circuit breakers. Also, the applicable plant and vendor drawings will be revised, as appropriate, to differentiate between the vendor's molded case switch and their molded case circuit breaker. These actions will be completed by June 16, 1995.
2. The nomenclature labeling for the 120-volt alternating current vital inverter output device will be corrected by February 10, 1995.
3. The system operating instructions for the vital inverters will be revised by March 10, 1995, to use the same nomenclature for components that is actually on the labels.