



Tennessee Valley Authority, Post Office Box 2000, Scotts-Dale, Tennessee 37379

J. L. Wilson  
Vice President, Sequoyah Nuclear Plant

March 19, 1992

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,  
328/92-02 - RESPONSE TO NOTICE OF VIOLATION (NOV) 50-327, 328/92-02-01

Enclosure 1 contains TVA's response to Bruce A. Wilson's letter to Dan A. Nauman dated February 18, 1992, which transmitted the subject NOV. This violation concerned a lack of control of drawings available for use by operators in the turbine and auxiliary buildings. TVA's response includes actions taken to ensure that the drawings available for operator use in the plant are appropriately controlled to ensure their accuracy in reflecting plant configurations. Enclosure 2 contains a summary of commitments made in this submittal.

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

Sincerely,

*J. L. Wilson*  
J. L. Wilson

Enclosures  
cc: See page 2

U.S. Nuclear Regulatory Commission

Page 2

March 19, 1992

Enclosures

cc (Enclosures):

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

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

Mr. B. A. Wilson, Project Chief  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-327/92-02 AND 50-328/92-02  
BRUCE A. WILSON'S LETTER TO DAN A. NAUMAN  
DATED FEBRUARY 18, 1992

Violation 50-327, 328/92-02-01

"Technical Specification 6.8.1 requires that procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, be established, implemented and maintained. This includes procedures for operation and control of safety-related systems. The requirements of TS 6.8.1 are implemented, in part, by the following procedure:

"Site Standard Practice (SSP) 10.1, Controlling Drawings, Revision 0, details the licensee's administrative controls for drawing updates and maintenance. Section 3.4.D requires, in part, that controlled drawing holders ensure that controlled drawings are received, properly filed, receipt acknowledged, and maintained in a current state. Section 3.7.B additionally requires the Document Control and Records Management manager to ensure the proper stamp (labeled as controlled) is placed in red ink on the drawings.

"Contrary to the above, numerous examples of improperly filed drawings (interfiling of same drawing with different revisions), examples of uncontrolled drawings, and examples of improperly labeled drawings were identified at controlled drawing stations in the Auxiliary, Turbine, and other buildings and were available for use by operators.

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

Admission

TVA admits the violation.

Reason for the Violation

The Document Control and Records Management (DCRM) organization is responsible for distributing new and revised drawings. Distribution is accomplished in two ways: The first way is for DCRM personnel to personally insert the new or revised drawings in the drawing holders and remove the outdated drawings; the second way is through distribution to the responsible line organization for filing. DCRM personnel are trained and cognizant of their duties; it was determined that the recipients of the distributed drawings often delegate the filing to clerks who are not trained and are not cognizant of the importance of having updated drawings filed correctly and in a timely manner. The drawings located on Elevation 669 of the auxiliary building were normally updated by clerks who had not received any training or instructions as to the importance of correctly filing drawings in a timely manner. As a result, drawings in the auxiliary building were not always filed in a proper and timely manner. Through further review, it was determined that drawing locations in other buildings not maintained by DCRM personnel were also affected by the same problem.

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

Operations requested that only flow and logic diagrams necessary for plant operations be assigned to the drawing locations in the auxiliary and turbine buildings. As requested, a complete new set of controlled drawings was placed in each location.

The Site Quality organization was requested to perform an audit on several drawing locations to identify any other drawing discrepancies. This resulted in DCRM initiating a problem evaluation report to correct and document the discrepancies pointed out by Site Quality.

DCRM transmitted a request to drawing location owners to perform an audit of the files and request replacement drawings for any damaged, outdated, or missing drawings. This self-audit has been completed with only minor discrepancies noted. These discrepancies have been corrected. DCRM will perform a confirmatory audit of the satellite drawing locations.

#### Corrective Action Taken to Prevent Recurrence

The number of satellite drawing locations has been drastically reduced and DCRM has been assigned the responsibility to file and maintain all but one controlled drawing location onsite at Sequoyah. The responsible owner of the one drawing location still on a mailing distribution is now procedurally required to return outdated drawings with the receipt acknowledgement. Organization personnel have been trained and are cognizant of their responsibility for maintaining up-to-date drawings.

Site Quality will periodically monitor the control of drawings.

#### Date When Full Compliance Will Be Achieved

DCRM will perform a confirmatory audit by April 13, 1992, of the satellite drawing locations to verify compliance.

ENCLOSURE 2

Commitment

Document Control and Records Management will perform an audit of the satellite drawing locations by April '93, 1992.