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J. L. Wilson  
Vice President, Sequoyah Nuclear Plant

January 21, 1992

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) - RESULTS OF OVERTIME MONITORING CONDUCTED  
DURING THE UNIT 1 CYCLE 5 REFUELING OUTAGE

In response to Notice of Violation (NOV) 50-327, 328/90-34-01, TVA committed to monitoring overtime controls during the Unit 1 Cycle 5 refueling outage to ensure corrective actions that had been taken as a result of the violation were effective to control overtime when meaningfully "tested" during the outage.

Monitoring conducted during the outage concluded that overtime was administered as required by procedures. SQN's organizations tracked overtime usage for their employees. Overtime limitation exception reports for individuals exceeding the overtime limits were completed before the work activities with a few exceptions early in the outage, which were corrected as soon as the appropriate managers became aware of the over-limit condition. Reports submitted were properly completed and received appropriate approvals.

Precut planning focused on minimizing overtime use for Operations. The outage schedule was resource-levelled around the Operations department to ensure proper staffing was available without excessive overtime for these critical positions. Operations staffing was also augmented, and an outage rotation was also established for the senior reactor operators to aid in reducing overtime required.

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U.S. Nuclear Regulatory Commission

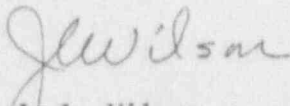
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Management focus, preoutage planning, and review and adjustment during the outage ensured that overtime for the critical positions of control room operators was controlled. Other organizations did work more overtime than optimally desired; however, when overtime exceeding the prescribed limits was required, it was properly tracked, evaluated, and approved. SQN management will continually strive to minimize the amount of overtime required and is presently evaluating the schedule for the upcoming Unit 2 Cycle 5 outage.

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

Sincerely,

  
J. L. Wilson

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