

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

February 28, 1984

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/83-25 AND 50-328/83-25 - RESPONSE TO VIOLATION

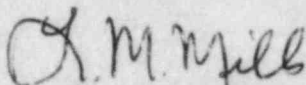
The subject OIE inspection report dated December 19, 1983 from D. M. Verrelli to H. G. Parris cited TVA with one Severity Level V Violation. An initial response was submitted by my January 18, 1984 letter to you. As a result of a telephone conversation with an NRC Region II representative, enclosed is a revised response to the subject inspection report.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


L. M. Mills, Manager
Nuclear Licensing

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Records Center (Enclosure)
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

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1983-TVA 50TH ANNIVERSARY

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ENCLOSURE

REVISED RESPONSE - NRC INSPECTION REPORT NOS.
50-327/83-25 AND 50-328/83-25
D. M. VERRELLI'S LETTER TO H. G. PARRIS
DATED DECEMBER 19, 1983

327, 328/83-25-01

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Technical Instruction TI-20, "Chemical Laboratory Test Equipment Calibration Program," requires daily calibration checks be performed and documented in accordance with the instruction.

Contrary to the above, the results of daily calibration checks associated with the chemical laboratory test equipment, including pH meters, spectrophotometers, and automatic titrators, were not documented during the period from January to November 1983.

This is a Severity Level V Violation (Supplement IV).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

This violation resulted from a disparity between two approved plant procedures, TI-11, "Chemical Analytical Methods," and TI-20, "Chemical Laboratory Test Equipment Calibration Program." The chemical laboratory was utilizing the TI-11 procedure exclusively while TI-20 procedure was in the revision process to delete conflicting information.

3. Corrective Steps Which Have Been Taken

A request for waiver to Division Procedures Manual (DPM) N79E2 has been submitted to the nuclear central office for evaluation. This request calls for documentation of calibration of laboratory equipment but asks for relief on the requirements to document all standardization checks of all laboratory equipment until a reevaluation of the requirements in the DPM can be compared to the requirements of the various regulatory documents. In a telephone conversation with Dan Montgomery NRC, Region II on February 7, 1984, NRC agreed that this reevaluation and continuing to do standardization checks per TI-11 would be acceptable as long as a schedule was developed for completion of the various stages.

This reevaluation may result in changing of procedural requirements to meet the regulatory requirements, the intent of INPO good practices, and to be consistent with industry-accepted methods of ensuring that laboratory methods and equipment provide quality data. These procedural changes may involve changing program documents and subsequently the implementing procedures.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

This reevaluation will be completed and TVA will submit a follow-up report, by May 15, 1984, which will provide an outline of the actions that will be taken and a schedule for completion.

5. Date When Full Compliance Will Be Achieved

The follow-up report will specify what actions are required and the date when full compliance will be achieved.