

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

May 25, 1984

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U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/84-01 AND 50-328/84-01 - RESPONSE TO VIOLATION

The subject OIE inspection report dated February 14, 1984 from R. C. Lewis to H. G. Parris cited TVA with one Severity Level IV Violation. A response to the item of violation in the inspection report was submitted by my March 15, 1984 letter to you.

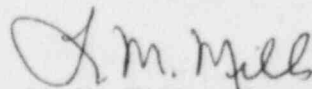
Enclosed is our response to your April 27, 1984 letter which requested an additional response. The response addresses the concerns expressed in a May 17, 1984 telephone conversation with members of your staff.

If you have any questions, please get in touch with R. H. Skell 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

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ENCLOSURE

ADDITIONAL RESPONSE - NRC INSPECTION REPORT NOS.

50-327/84-01 AND 50-328/84-01

R. C. LEWIS'S LETTER TO H. G. PARRIS

DATED FEBRUARY 14, 1984

Item B (327, 328/84-01-02)

10 CFR 50, Appendix B, Criterion XIII as implemented by the licensee's QA Program (TVA-TR75-1) require that measures shall be established to control storage of materials to prevent damage. TVA-TR75-1 commits to Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water Cooled Nuclear Power Plants. This guide endorses ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants. Section 6.3.2 of this standard requires that items stacked for storage shall be arranged so that racks, cribbing, or crates are bearing the full weight without distortion of the item.

Contrary to the above, several boxes containing reactor plant equipment identified as control rod drive mechanisms, located in Outside Building One, were stacked in such a manner that allowed bending of some containers which could result in distortion of the parts inside the containers.

This is a Severity Level V (Supplement I).

1. Admission or Denial of the Alleged Violation

TVA denies that a violation occurred.

2. Reason for the Denial

This NRC violation cited a condition which indicated Sequoyah was not in compliance with ANSI N45.2.2-1972. TVA responded to this violation with a denial stating that the cited condition did not violate ANSI requirements since no deflection of the items in the crate occurred.

In a subsequent telecon on May 17, 1984, NRC stated that the specific example cited was not the issue of the violation but rather an example which indicates an inadequate program for storage of QA material. We do not agree that this indicates NRC or ANSI requirements were not met and consider the Sequoyah program for storage of QA material to be adequate. Attached is Sequoyah Administrative Instruction AI-36, "Storage, Handling, and Shipping of QA Material," for your review and evaluation.

In the above-mentioned telecon, NRC recommended that guidance be provided the people performing the stacking operation in the form of a local instruction.

We agree with the recommendation that a local section instruction on stacking of crates would benefit the existing program and are pursuing this activity. We consider the existing program, however, to meet the NRC and ANSI requirements. These added instructions will, however, fortify the existing program.