

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

R.J. Adney
Site Vice President
Sequoyah Nuclear Plant

February 3, 1997

U.S. Nuclear Regulatory Commission
Attention:
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) UNITS 1 and 2 - REPLY TO NOTICE
OF VIOLATION (NOV) - NRC INSPECTION REPORT NOS. 50-327,
328/96-12

This letter responds to Harold O. Christensen's letter to
Oliver D. Kingsley, Jr., dated January 2, 1997, that
transmitted the subject NOV. The NOV addresses one violation
associated with the failure to adequately maintain emergency
procedures.

The NRC letter transmitting the subject NOV expressed NRCs
concern relative to similarities between this violation and a
previously issued violation that was contained in NRC
Inspection Report 50-327, 328/96-05. TVA has reviewed both
violations and has determined that although the violations
both deal with abandoned equipment, the specific causes of the
violations are different. However, TVA is concerned in
general about how abandoned equipment is addressed. We
believe that as a result of the actions taken and that are to
be taken, to resolve the subject violation, understanding of
plant impact as a result of abandoning equipment will improve.

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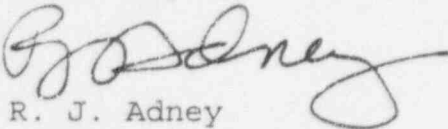
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Enclosure 1 contains TVA's response to the NOV. Commitments associated with the submittal are contained in Enclosure 2.

If you have any questions concerning this submittal, please telephone R. H. Shell at (423) 843-7170.

Sincerely,


R. J. Adney

Enclosures

cc (Enclosures):

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ENCLOSURE 1

REPLY TO THE NOTICE OF VIOLATION
NRC REPORT NOS. 50-327, 328/96-12
HAROLD O. CHRISTENSEN'S LETTER TO OLIVER D. KINGSLEY, JR.
DATED JANUARY 2, 1997

DESCRIPTION OF VIOLATION 50-327, 328/96-12-01:

"Sequoyah Technical Specification 6.8.1 requires that procedures shall be established, implemented and maintained for activities which include the recommended procedures of Appendix "A" to Regulatory Guide 1.33, Revision 2, February 1978.

"Regulatory Guide 1.33, Revision 2, Appendix "A", Section 6 includes Procedures for Combating Emergencies and other Significant Events, such as ... Loss of Coolant ... and Reactor Trip ...

"Contrary to the above, the Procedures for Combating Reactor Trip or Safety Injection (E-0, Revision 18) and Loss of Reactor or Secondary Coolant (E-1, Revision 13) were not adequately maintained in that both procedures required operator actions based on information obtained from radiation recorded RR-90-12, which was found to have been abandoned in place for a period exceeding two years. This deficiency was caused by failure of the licensee to adequately implement the design control process for abandoned plant equipment.

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

REASON FOR VIOLATION

The cause of the violation was the failure to recognize the involvement of emergency operating procedures (EOPs) when the decision was made to stop maintaining the radiation recorder 0-RR-90-12. In March 1993, a problem evaluation report (PER) was initiated to address repetitive failures and obsolete parts on plant radiation monitors, including continuous air monitors (CAMs). As a result of that PER, a design change request was initiated to remove some CAMs, replace other CAMs, add three monitoring stations, and to replace the associated obsolete multi-point radiation recorder (0-RR-90-12). In March 1994, after the design change request was initiated and approved, maintenance of the equipment (including the radiation recorder) was discontinued. Subsequent to the March 1993 PER, design documentation was issued, based on overall site priorities, to render some of the CAMs obsolete and to remove the recorder's alarm function. In January 1996, TVA determined that configuration control problems existed with the remaining CAMs

and associated recorder as a result of the equipment not being maintained and no approved design output documentation being issued for abandonment of the equipment. This condition was documented on a PER and a corrective action plan was developed to issue a design change notice for abandonment of the remaining equipment. In November 1996, during Maintenance Rule evaluations, TVA discovered that the EOPs still addressed use of radiation recorder 0-RR-90-12.

CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

The Operations department performed a review of procedures to determine which procedures reference the inoperable radiation recorder. Four procedures were identified by the review, and those procedures were revised to remove reference to recorder 0-RR-90-12. The information that would have been provided by the recorder is available through other means.

Plant equipment that fell within the scope of the maintenance rule and is referenced in Revision 1B of the EOPs was reviewed. Radiation recorder 0-RR-90-12 was the only component identified as unavailable.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Operations personnel will review the EOPs by March 28, 1997, to determine if other equipment referred to in the EOPs, but outside the scope of the maintenance rule, is not being maintained functional. Any procedural changes required as a result of this review will be completed by April 25, 1997.

To ensure equipment impacts are properly evaluated before discontinuance of maintenance activities, appropriate process(es) will be revised by March 28, 1997, to require the performance of appropriate evaluations including recognition of EOP impact.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the violation, TVA will be in full compliance following additional procedural reviews and revision of the operator work around process in March 1997 and completion of any procedural changes in April 1997.

ENCLOSURE 2

COMMITMENTS TO THE NOTICE OF VIOLATION
NRC REPORT NOS. 50-327, 328/96-12
HAROLD O. CHRISTENSEN'S LETTER TO OLIVER D. KINGSLEY, JR.
DATED JANUARY 2, 1997

VIOLATION 50-327, 328/96-12-01:

1. Operations personnel will review the EOPs by March 28, 1997, to determine if other equipment referred to in the EOPs, but outside the scope of the maintenance rule, is not being maintained functional. Any procedural changes required as a result of this review will be completed by April 25, 1997.
2. To ensure equipment impacts are properly evaluated before discontinuance of maintenance activities, appropriate process(es) will be revised by March 28, 1997, to require the performance of appropriate evaluations including recognition of EOP impact.