

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

August 29, 1985

U.S. Nuclear Regulatory Commission  
Region II  
ATTN: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/85-23 AND 50-328/85-23 - RESPONSE TO VIOLATIONS

Enclosed is our response to D. M. Verrelli's August 2, 1985 letter to  
H. G. Parris transmitting IE Inspection Report Nos. 50-327/85-23 and  
50-328/85-23 for our Sequoyah Nuclear Plant which cited TVA with three  
Severity Level V Violations.

If you have any questions, please get in touch with R. E. Alsup at FTS  
858-2725.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. A. Domer*  
J. A. Domer, Chief  
Nuclear Licensing Branch

Enclosure

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

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ENCLOSURE  
RESPONSE - NRC-OIE INSPECTION REPORT  
NOS. 50-327/85-23, 50-328/85-23  
DAVID M. VERRELLI'S LETTER TO H. G. PARRIS  
DATED AUGUST 2, 1985

Violation 50-327/85-23-01, 50-328/85-23-01

10 CFR 50, Appendix B, Criterion XIII requires that measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment to prevent damage or deterioration. The licensee's approved Quality Assurance (QA) program, Topical Report TVA-TR75-1, requires that plugs and/or tape be used to seal openings in items having sensitive internal surfaces and that all plugs or other closures remain intact. Technical Instruction TI-70, Cleaning and Decontamination of Plant Equipment, implements the licensee's approved QA program and requires that stainless steel material be stored with ends capped or taped.

Contrary to the above, stainless steel piping and flanges stored in an Auxiliary Building designated storage area were not sealed with plugs or tape.

This is a Severity Level V violation (Supplement 1).

1. Admission or Denial of Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

The violation occurred due to SQN Technical Instruction (TI)-70 requiring stainless steel material to be capped or taped at all times. TI-70 gave no flexibility for the capping requirements while the stainless steel material was in the fabrication or installation stage.

3. Corrective Steps Taken and Results Achieved

- A. Appropriate disciplinary action was taken against the employees involved.
- B. TI-70, "Cleaning and Decontamination of Plant Equipment," has been revised to clarify requirements for end caps during fabrication and installation activities.
- C. Handling requirements for stainless steel will be reemphasized with craft personnel during training sessions.

4. Corrective Steps Taken to Avoid Future Violations

See step 3 for details.

5. Date When Full Compliance Will Be Achieved

The plant was in full compliance August 22, 1985.

Violation 50-327/85-23-02, 50-328/85-23-02

10 CFR 50, Appendix B, Criteria XVI states that measures shall be established to assure that conditions adverse to quality such as failures, deficiencies, and deviations are promptly identified and corrected.

Contrary to the above, the licensee failed to take prompt corrective action to violation 327, 328/85-31-01, as committed to in TVA letter A27-340315-013, dated March 15, 1984. The corrective action which had not been implemented was a periodic check of keycard records against Radiation Work Permit (RWP) records.

This is a Severity Level V violation (Supplement I).

1. Admission or Denial of Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

The violation occurred due to TVA not revising the response to 327, 328/83-31-01 deleting the commitment to perform a periodic check of key card records against radiation work permit (RWP) records.

3. Corrective Steps Taken and Results Achieved

A revised response to NRC violation 327, 328/83-31-01 will be provided deleting the requirement to perform a periodic check of key card records against RWP records. Some key carded areas that have required an RWP for entry in the past have been decontaminated, and the portion of the room requiring an RWP has either been reduced to the point that visual inspections can be performed without an RWP or the RWP requirement has been eliminated completely. Because of this, any information obtained by performing the cross check would be of little value.

4. Corrective Steps Taken to Avoid Future Violations

See step 3 above.

5. Date When Full Compliance Will Be Achieved

The plant will be in full compliance by September 13, 1985.

Violation 50-327/85-23-03, 50-328/85-23-03

Technical Specification (TS) 6.8.1 requires that written procedures be implemented for the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Security and Visitor Control is listed in Appendix A and is therefore subject to TS 6.8.1. Physical Security Instruction PhySI-2, "Access, Badging and Identification" implements the requirement to have written security and visitor control procedures. PhySI-2 states in Section 12.2 that employees shall display their identification badge between the shoulder and waist and the picture shall be visible at all times.

Contrary to the above, on June 21, 1985, in an assembled group of approximately twelve workmen in the protected area, one permanently badged individual did not have his badge in his possession and one temporarily badged visitor was not correctly displaying his badge.

This is a Severity Level V violation (Supplement III).

1. Admission or Denial of the Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

A. The permanently badged employee was wearing a shirt as an outer garment. He took the shirt off, put it inside the cab of the truck he was driving, and walked to the back of the truck. He forgot to obtain his picture badge from the shirt.

B. The visitor was also wearing a shirt as an outer garment, and when he put it on, he forgot to place his visitors badge on the outside of the shirt.

3. Corrective Steps Taken and Results Achieved

Both individuals were corrected on the spot and instructed to ensure that picture badge and visitor badge is prominently displayed on the outermost garment at all times while inside the protected area.

4. Corrective Steps Taken to Avoid Future Violations

Correct procedures for the wearing of picture badges and visitor badges are in place. Employees and visitors receive training or instructions on these procedures. Additionally, both individuals received verbal warnings for not following procedures.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 21, 1985, immediately following discovery of the violation.