

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

June 3, 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
50-327/85-13 AND 50-328/85-13 - RESPONSE TO VIOLATION

Enclosed is our response to R. D. Walker's May 3, 1985 letter to
H. G. Parris transmitting IE Inspection Report Nos. 50-327/85-13 and
50-328/85-13 for our Sequoyah Nuclear Plant which cited TVA with one Severity
Level IV Violation and one Severity Level V Violation.

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

8507120011 850603
PDR ADDCK 05000327
G PDR

35 JUN 6 40:20

ENCLOSURE
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2
NRC INSPECTION REPORT 50-327/85-13 AND 50-328/85-13
R. D. WALKER'S MAY 3, 1985 LETTER TO H. G. PARRIS

Violation 50-327, 328/85-13-02

10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR 50.47(b)(15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training. Section 4.1.1 of the Sequoyah Nuclear Plant Radiological Emergency Plan states, in part, that it is the responsibility of the Site Emergency Director to initially make recommendations for protective actions to State and local agencies if necessary. Section 4.1 of the Plan states that the Shift Engineer on duty may be designated the Site Emergency Director and acts for him until relieved.

Contrary to the above, Shift Engineers' performance during walkthrough interviews indicated that training was inadequate in the area of protective action decisionmaking. Specifically, the Shift Engineers were not capable of consistently determining when and what type of protective action recommendations were appropriate to protect health and safety of the public.

This is is Severity Level IV violation (Supplement VIII).

1. Admission or Denial of the Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

The Sequoyah Nuclear Plant (SQN) Implementing Procedures Document (IPD) provides guidance for the shift engineer to use in making a protective action recommendation (PAR) to offsite authorities. IP-5 includes a logic diagram which the shift engineer uses to select an appropriate PAR for a general emergency.

The violation occurred because the SQN Procedure IP-5 lacked specific instructions and guidance.

3. Corrective Steps Taken and Results Achieved

The SQN IP-1, "Emergency Plan Classification Logic," and IP-5, "General Emergency," (i.e., shift engineers Radiological Emergency Plan (REP) implementation instructions for general emergency) are being reviewed, and the IP-5 logic diagram for selecting an appropriate PAR will be revised to provide

more specific guidance. This action will be completed, and a memorandum or training letter (which requires acknowledgement) describing the procedure changes will be sent to all shift engineers and assistant shift engineers by August 1, 1985. The procedure changes will also be reviewed with them during scheduled licensed operator requalification training which will be completed by December 31, 1985.

4. Corrective Steps Taken to Avoid Future Violations

The revision of SQN's IP-5 procedures and subsequent retraining of SQN personnel will resolve the alleged violation. The SQN Operations Training Section will ensure these procedures are included, as appropriate, in future training sessions.

5. Date When Full Compliance Will Be Achieved

The SQN procedures will be reviewed and revised, and training will be completed by December 31, 1985.

Violation 50-327, 328/85-13-01

Sequoyah Nuclear Plant Technical Specifications, paragraph 6.8.1.e specifies, in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below: . . . e. Site Radiological Emergency Plan implementation." The Sequoyah Nuclear Plant Radiological Emergency Plan, Section 7.1.12.2, Fixed Sirens, states, in part, "the siren system is activated on a monthly basis by TEMA as a regularly scheduled test. A silent test is conducted every two weeks to test the radio link to the sirens. The silent test advances a counter on each siren if the radio link is complete. TVA employees read the counters on a monthly basis.

Contrary to the above, the silent test had not been run every two weeks for approximately seven months, but had been included in the monthly test for the ensuing period.

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

1. Admission or Denial of the Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for the Violation

The violation occurred because TVA failed to revise the SQN REP to reflect interim schedule changes for silent tests and failed to obtain official NRC concurrence to deviate from the REP.

The program described in the REP for testing of sirens includes a monthly activation of the fixed sirens. At two-week intervals, a silent test is performed, one being performed immediately before each monthly full activation test. The silent test advances a counter located on the siren structure, and counters are read on a monthly basis.

TVA is in the process of upgrading the activation circuit for the Sequoyah prompt notification system sirens. While these modifications are in process, TVA personnel have been monitoring the monthly siren activations, including the counter advance from positions both at the Tennessee Emergency Management Agency (TEMA) Emergency Operations Center and in the field. During this interim period, it was jointly decided by TEMA and TVA to temporarily suspend the silent tests that are normally scheduled two weeks after the monthly siren activation (i.e., perform the silent test on a monthly basis only). The two-week silent test was discontinued on May 21, 1984. The radio circuit that is used to activate the sirens is a circuit that TEMA also uses during normal operations, so problems with it would be readily identified. This will ensure

an operable circuit during the time between the monthly tests. Additionally, the SQN REP requires that the counters be read on a monthly basis so this temporary suspension of the two-week silent test did not affect the frequency of data collection. NUREG-0654 recommends an annual full cycle test of fixed sirens; however, our testing program requires a full cycle test of the fixed sirens on a monthly basis to ensure system reliability.

3. Corrective Steps Taken and Results Achieved

TVA and TEMA resumed the original frequency for performing the silent test on May 15, 1985.

4. Corrective Steps Taken to Avoid Future Violations

No additional deviations from the siren test schedule will be initiated unless such changes are reflected in the REP. Individuals responsible for making changes to the REP have been reinstructed on established guidelines for making changes on the REP.

5. Date When Full Compliance Will Be Achieved

A letter from TVA to TEMA dated April 22, 1985 documents the decision to resume the two-week silent test frequency. We are currently in compliance with the two-week silent test REP commitment.