

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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MAR 29 1988

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket Nos. 50-327
50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327/88-02 AND
50-328/88-02 RESPONSE TO NOTICE OF VIOLATION

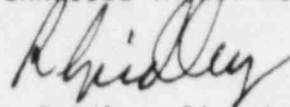
Enclosed is TVA's response to F. R. McCoy's letter to S. A. White dated
February 25, 1988, that transmitted Notice of Violation 50-327, -328/88-02-01
with four examples.

Enclosure 1 provides TVA's response to the Notice of Violation. Enclosure 2
contains a list of commitments contained in this submittal. TVA does not
recognize any other items described herein as commitments.

If you have any questions, please telephone M. R. Harding at (615) 870-6422.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Director
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cc (Enclosures):

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ENCLOSURE 1

Violation 50-327, -328/88-02-01

"Technical Specification 6.8.1 requires that procedures be established, implemented, and maintained covering maintenance, surveillance, and test activities of safety related equipment. Additionally, Technical Specification 6.8.1. requires that the applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Revision 2, February 1978 be established, implemented, and maintained.

Regulatory Guide 1.33 recommends that activities involving startup and operation of the Main Steam System be covered by procedures.

System Operating Instruction (SOI)-1.1, Main Steam, requires that RCS Tave be between 300°F and 350°F prior to warming the main steam lines and placing the main steam system in service. SOI-1.1 also requires that all four MSIVs be opened simultaneously.

Administrative Instruction (AI)-25, (Part I), Rev. 23, 'Drawing Control After Licensing,' requires that controlled copies, date stamped copies, work plan copies or best available vendor drawing copies be used to perform work.

Surveillance Instruction (SI)-187, Containment Inspection, requires a visual inspection of the containment which verifies that no loose debris (rags, trash, clothing, flaked paint, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions.

Contrary to the above,

1. On February 7, 1988, SOI-1.1 was not complied with during startup of the Unit 2 Main Steam System in that RCS Tave was not between 300°F and 350°F prior to warming the main steam lines and placing main steam in service. This noncompliance contributed to a high steam flow indication which resulted in a MSIV isolation, generation of a reactor trip signal, and a feedwater isolation.
2. During recovery from this event later on February 7, 1988, only the #4 steam generator MSIV was opened to equalize pressure in the main steam header. This noncompliance resulted in a steam generator swell condition and resultant feedwater isolation.
3. On January 31, 1988, a portion of an unidentified drawing marked 'Information Only' was used to perform work on containment spray system flow indicator 2-FI-72-34.
4. On February 1, 1988, following the licensee's performance of SI-187, portions of the containment ice condenser were found to be inadequate to support plant restart due to various debris and foreign material being present within the ice condenser. On February 2, 1988, following cleanup of the area, the licensee stated that the containment ice condenser was again ready to support restart, but upon reinspection the ice condenser condition was still found to be deficient.

This is a Severity Level IV (Supplement I) Violation."

Admission or Denial of the Alleged Violation (Examples 1 and 2)

TVA admits the violation for examples 1 and 2.

Reason for the Violation

The reason for the violation was that procedure SOI-1.1 should have been classified as a "category A" procedure.

Corrective Steps That Have Been Taken

SOI-1.1, "Main Steam," was upgraded to a category A procedure to ensure compliance during the performance of the instruction. Category A procedures require that the procedure be present and referred to directly during performance. Additionally, AI-4, "Use of Procedures," was revised to rewrite the category A and "category B" procedure usage section to be more concise and clear.

As an additional measure, SOI-1.1 was reviewed to determine if adequate direction was provided for opening of the main steam isolation valves (MSIVs). A request was made to Division of Nuclear Engineering to perform an engineering evaluation to ensure a more appropriate method to open the MSIVs did not exist. The results of the evaluation supported the present temperature requirements contained in SOI-1.1 and made recommendations on the preferred delta P across the MSIVs before opening. The optimal delta P of less than or equal to 5 pounds per square inch differential (psid) was physically impossible to achieve, so the SOI revision provided a range of between 5 and 25 psid, which is realistically attainable. The SOI revision also incorporated the use of local Heise gauges that have a lower scaling than the control room instrumentation. The use of the local gauges provides Operations a method to more accurately read the delta P across the MSIVs and aids in the opening of the MSIVs.

All Operations personnel were briefed at the shift briefing meetings concerning the event, the changes to AI-4, and the changes to SOI-1.1.

Corrective Steps That Will Be Taken to Avoid Further Violations

As committed to in Licensee Event Report SQRO-50-328/88006, an evaluation of all category B SOIs will be performed to determine if this categorization is correct.

Date When Full Compliance Will Be Achieved

TVA is in full compliance.

Admission or Denial of the Alleged Violation (Example 3)

TVA admits the violation for example 3.

Reason for the Violation

On January 31, 1988, maintenance work was performed on the containment spray pump 2A flow loop 2-F-72-34. The work to be performed consisted of backfilling the low-side sense line of 2-FM-72-34A, 2-FM-72-34B, and 2-FI-72-34 in accordance with SI-203.

A prework briefing was conducted with the Instrument Maintenance employees involved with the work and included the senior instrument mechanic foreman. The foreman had, as a reference, a copy of the instrument loop drawing that he had obtained and marked "For Information Only" in his handwriting. This copy was used during the briefing to provide guidance to the Instrument Maintenance employees on the instrument loop configuration. The foreman referred to SI-203 that was the document by which the work would be performed. The terminals on the drawing agreed with the terminals prescribed by SI-203. The copy of the drawing was not used during the performance of the work. SI-203 was used as the controlling document and configuration control was maintained by SI-203 and Instrument Maintenance Instruction 134. All lifted leads were specified in the SI-203 package. During the performance of the calibration, however, the senior instrument mechanic foreman took the "information only" drawing to the field and used the drawing as a check of the work being performed by the Instrument Maintenance employees.

Because the drawing was not used to do physical work, the foreman did not realize the incident represented a potential violation of procedures.

Corrective Steps That Have Been Taken

Condition Adverse to Quality Report (CAQR) SQN880159 has been issued to document and track corrective actions taken. The item was discussed with the senior instrument mechanic foreman, and he is aware of the procedural requirement to use only controlled drawings or controlled prints.

Corrective Steps That Will Be Taken to Avoid Further Violations

Instrument Maintenance will conduct training classes with instrument mechanics to reinforce the requirements described in AI-25, "Drawing Control After Unit Licensing, Unit 0, 1 and 2."

Dates When Full Compliance Will Be Achieved

TVA is in full compliance. The training classes will be completed by May 27, 1988.

Admission or Denial of the Alleged Violation (Example 4)

TVA admits the violation for example 4.

Reason for the Violation

SI-187, "Containment Inspection," was performed by Operations several times in preparation for entry into mode 4. During the time the first inspection was being performed, there were various maintenance activities being performed in the unit 2 ice condenser. The Operations group presumed the responsible supervisor for the individual work activities would ensure the work area would be left clean in accordance with Sequoyah Standard Practice SQA66, "Plant Housekeeping," as is the practice with maintenance activities. As a result, the lower ice condenser was not adequately inspected by Operations employees. The second occurrence is attributable to a lack of attention to detail and a complacent attitude resulting in the failure to adequately reperform SI-187. The lack of management involvement is considered a contributing factor to these events.

Corrective Steps That Have Been Taken

The Plant Manager has discussed this issue with all supervisors and has stressed the importance of keeping containment clean to ensure emergency core cooling system integrity. Additionally, the Plant Manager emphasized the importance of maintaining a high standard of work ethics.

Corrective Steps That Will Be Taken to Avoid Further Violations

There is no further corrective action required for example 4.

Date When Full Compliance Will Be Achieved

TVA is in full compliance.

ENCLOSURE 2

1. Instrument Maintenance will conduct training classes on AI-25 with instrument mechanics by May 27, 1988.