

PART A INITIATION

*PLANT(S)/ORGS AFFECTED Sequoyah * (1A) UNIT 1 & 2 * (2A) SYSTEM 1B
 *(3A) COMPONENT 7-Day Diesel Fuel Storage *(4A) VENDOR N/A *(4A) CONTRACT N/A
 EQUIPMENT VIOLATED At least once per 92 days and from new fuel oil prior to addition to the 7 days tanks by verifying that a sample obtained in accordance with ASTM-D270-1975 (cont'd)
 *(6A) SOURCE OF REQUIREMENT VIOLATED Technical Specification SR 3.3.1.1.2.C *(7A) REFERENCE NER OE-3491
 *(8A) DESCRIPTION OF CONDITION Technical Specification SR 3.3.1.1.2.C requires sampling of the 7 day diesel fuel storage tanks once per 92 days in accordance with ASTM D270-1975. The ASTM methods for sampling are not consistent with Sequoyah design and present sample methods, therefore the sample methods being used must be verified or modified to comply with ASTM D270-1975
 *CAQR OR PRD INITIATED BY Don Amos DATE 8/14/89 *TEL 6930 *INITIATORS ORG. SGO-CEM
 *DATE/TIME CAQ DISCOVERED 8/14/89 1500 *DATE OF CAQ OCCURRENCE, IF KNOWN 8/14/89 1500

(9A) POTENTIALLY AFFECTS OPLRABILITY: YES NO SPECIFY PLANTS SON Unit 1 & 2
 *(10A) ABNORMAL EVENT YES NO (11A) HARDWARE CAOR YES NO POSSIBLE
 *(12A) RESPONSIBLE ORGANIZATION SGO/CEM Chem COORDINATED WITH Don Amos DATE 8/14/89
 *(13A) MANAGEMENT REVIEWER MARK E. REINOLDS MGR *DATE: 8/17/89 *TITLE: QUALITY TRACKING PLAN
 *CAQ COORDINATOR ALESIA C. JUSTICE AG *DATE RECEIVED: 8/17/89

PART B CORRECTIVE ACTION

(1B) TAGS REQUIRED (BY DNOA[SQM]) YES NO IF YES, NO. PLACED _____ PLACED BY: _____
 (2B) POTENTIALLY REPORTABLE YES NO
 (3B) INTERIM MEASURES REQUIRED: YES NO IF YES, DESCRIBE BELOW OR PART D
 (4B) DISPOSITION: REWORK REPAIR ACCEPT-AS-IS SCRAP OTHER (DESCRIBE)
 (5B) REVIEW FOR POTENTIAL GENERIC IMPLICATIONS IS IS NOT REQUIRED. COPY SENT TO _____ ON _____
 NOT CAUSE ANALYSIS REQUIRED: YES NO SPECIFY APPARENT CAUSE BELOW OR PART D
 SAFETY EVALUATION REQUIRED YES NO See FER # IL-89-044
 (8B) ASME: YES NO IF YES, III OR XI (9B) HARDWARE CAOR YES NO
 *(10B) DESCRIPTION OF CORRECTIVE ACTION AND SCHEDULED COMPLETION DATE 9/30/89

- The following instructions will be issued to ensure that sampling of diesel fuel will be done in accordance with ASTM D270-1975; TI-6, TI-37, and SI-116.
- Sequoyah Technical Specification addressing diesel fuel will be evaluated to determine if a Technical Specification change is needed to reflect current day sampling and analysis techniques and requirements.
- The design of the seven day storage tanks will be evaluated for possible changes to facilitate sampling and enhance circulation. A design change request will be submitted if warranted.

INDICATE IF PART D , PART E , OR A CONTINUATION SHEET IS ATTACHED if warranted

APPROVAL	NAME	INIT	DATE	NAME	INIT	DATE
*PREP	<u>Donald G. Amos</u>	<u>DA</u>	<u>9/1/89</u>	AIA (ACCEPTANCE)		
*SUPV	<u>DON E. ADAMS JR</u>	<u>DEA</u>	<u>9/11/89</u>	POFC (REVIEW)		
				PLT MGR (APPROVAL)		
				RIMS NO		

TVA Exh. 146

PART C CLOSURE

*(1C) CORRECTIVE AND PREVENTIVE ACTION COMPLETE: _____ *DATE: 9-2
 *(2C) VERIFICATION COMPLETE BY _____ *DATE: _____
 *(3C) VERIFIED COMPLETED BY _____ *DATE: _____
 *(4C) TAGS REMOVED BY _____ *DATE: _____
 *CAQ COORDINATOR CLOSED _____ DATE: _____

CLEAR REGULATORY COMMISSION

Case No. 01-791-01 Official Exh. No. TVA 146
In the matter of TVA
Staff _____ IDENTIFIED ✓
Applicant _____ RECEIVED ✓
Intervenor _____ REJECTED _____
Other _____ WITHDRAWN _____
DATE 9-9-02 Witness Burzynski
Clerk R. Davis

DOCKETED
USNRC



2003 MAR 11 AM 9:04

OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

CAOR CONTINUATION

IDENTIFY THE INFORMATION THAT IS BEING CONTINUED ON THIS SHEET (FOR EXAMPLE: DESCRIPTION OF CONDITION)
 NOTE: ENTRIES MADE ON THIS SHEET SHALL BE SIGNED AND DATED

A) Requirement violated

Has a water and sediment content of less than or equal to .05 volume percent and a benzene to viscosity @ 100°F of greater than or equal to 1.8 but less than or equal to 5.8 centistokes when tested in accordance with ASTM-D 975-77, and an impurity level of less than 2 mg. of insolubles per 100 ml. when tested in accordance with ASTM-D 2274-70.

B) Openability

ASTM D270-1975, "Sampling Petroleum and Petroleum Products," is to be followed to ensure a representative sample of the diesel fuel is obtained prior to analysis. Segregated procedures obtain a representative sample by performing a two (2) volume recirculation of the tank contents, (min. of 68,000 gal volume, 200 gpm min. rate for 11 hours 20 min.) However, due to tank design (see attachment 1), the current recirculation procedure may not ensure adequate mixing.

The current diesel fuel oil sampling program is as follows:

1. New fuel - analyzed for all T.S. parameters prior to off-load and sample to the outside storage tanks (SI-295).
2. Outside Storage Tank - Once/84 days checked for water accumulation (SI-116)
3. 7-Day Storage Tanks - once/84 days recirculation for 11 hr. 20 min. at 200 gpm, then sampled and analyzed for all T.S. requirements (SI-116); once/31 days checked for water accumulation (SI-294).
4. Day Tanks - Once/31 days checked for water accumulation (SI-294)

Based on the above sampling and analysis results of all diesel fuel oil on site, the diesel generator are considered operable, and this is considered to be a representative sampling process for the oil in the 704y tank.

(5B) WBNP due to similar design as SNP

DGA
9/15/89

Don
8/15/89
F1000249

CAQR CONTINUATION

IDENTIFY THE INFORMATION THAT IS BEING CONTINUED ON THIS SHEET (FOR EXAMPLE: DESCRIPTION OF CONDITION)
NOTE: ENTRIES MADE ON THIS SHEET SHALL BE SIGNED AND DATED

Determination of QA Programmatic Deficiency

- 1. A. Does the CAQ involve widespread failure to address the requirements of procedures and instructions?
B. Does the CAQ involve a widespread failure to train and instruct personnel in QA program requirements including safety-related work activities?
C. Does the CAQ involve a widespread or deliberate failure to manage or supervise personnel in carrying out their assigned duties and responsibilities as related to the QA program?
D. Does the CAQ describe a potential stop work condition as described by AI-55?

Comments: THIS APPEARS TO BE AN ISOLATED CASE OF POSSIBLY INADEQUATE PROCEDURES

Evaluated by: [Signature] Date: 8/17/89

- 2. (Not applicable if Question Numbers 1A, 1B, or 1C are answered YES) Has the CAQ occurred with a frequency as to indicate that past preventative action has been lacking or ineffective?

Comments: Database search did not reveal a previous occurrence

Evaluated by: Sarah B. Orville Date: 8-28-89

- 3. Final Determination QA Programmatic Deficiency exists Potential Stop Work Condition exists

Approved by: [Signature] QI&I Section Supervisor Date: 8/28/89

TREND DATA: BASIC CAUSE CODE CW CAUSING ORG SQO I CEM 1 SEVERITY LEVEL IV

F1000250

APPENDIX H
 Page 12 of 12

POTENTIAL REPORTABILITY EVALUATION

Potentially Reportable:	If Yes, Specify			
	Yes*	Item Number	No	N/A
10 CFR 20			✓	
10 CFR 21			✓	
10 CFR 50.72	✓			
10 CFR 71			✓	
10 CFR 73.71			✓	
10 CFR 50.73	✓			

CAQR No. SAP 890457 Evaluator Donald G. Am Date 8/25/89

*If any column is marked "Yes," immediately hand-carry to the CAQ coordinator. The CAQ coordinator will hand-carry to PRS for reportability determination.

F1000251

1541A/naw

Title: HANDLING AND TRACKING OF CAQRS

No. QMI-716.5

Rev. 1

ATTACHMENT 2
Page 1 of 1

TO : Supervisor, PRS, Sequoyah
FROM : CAQ Coordinator, Sequoyah
DATE : 8/25/89
SUBJECT: CAQR SQP890457

The attached copy of the subject CAQR is being delivered to you to determine the affect on operability as required by AI-12 (Part I).

Please sign below acknowledging receipt.

Received by: Donna Anderson, 8-25-89
PRS Representative Date

Alma C. Carter
CAQ Unit Representative

Distribution
Original: CAQ Unit Files
Xcopy : PRS-Representative

FI000253

1609 19

APPENDIX L
Page 4 of 7

Attachment 1
CAQR Operability Assessment Sheet

1. CAQR No. QP890457 CAQR Revision 0
Operability Assessment Sheet Revision 0
2. Date PRS received CAQR N/A
3. Does this CAQR affect operability? Yes , No ⁸⁻³¹⁻⁸⁷

If Yes, initiate a PRO in accordance with SQA84 and notify Shift Operations Supervisor (SOS) and Plant management. PRO No. 1-89-187.

Date/Time SOS Notified: N/A 1

If No, complete Attachment 2.

Provide brief statement with respect to operability determination.

FAILURE TO ^{correctly} sample diesel fuel oil results in
O/G's being inoperable

4. If operability is affected, does the CAQR potentially impact other sites with an operating license? Yes No

If Yes, telecopy the CAQR to the affected plant PRS (unless they have already been notified).

Provide brief statement on potential impact on other plant.

Plant(s) sent to N/A

[Signature] PRS Engineer 8-30-87 Date

[Signature] Supervisor, PRS 8/31/87 Date

Distribution:
Original - PRS CAQ Files
Site CAQ Coordinator

1536A/naw

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APPENDIX L
Page 5 of 7

Attachment 2
Assessment of Safety (AOS)

CAQR No. SRP890457 Revision 0 AOS Revision 0

Justification for Continued Operation:

AT 1109 on 8-16-89 All four Diesel Generators were declared inoperable & a Notification of Unusual Event was entered. AT 1445 on 8-16-89 All fuel oil was within Tech Specs & the Plants declared Operable. During Sampling of the Fuel oil that would be representative of all tanks, water, sludge & sediment was found. The bottom of the tanks were pumped out removing the ~~contaminants~~ ^{water} contaminants. Representative samples taken from the bottom, middle & top of Tanks were in Tech Spec limits when tested.

SOP procedure that will be revised to ensure conformance with ASTM D270-1975 see: TI-16, TI-37 & SI-116. Design will also be evaluated of a possible design change. Revision to procedure should be made by 7-27-89.

Because of the cleaning of contaminants from the tanks, sampling procedure to insure sampling from different locations of all four Tanks to insure conformance to ASTM D270-1975 & connecting procedures, all fuel oil now in the future will be in conformance.

~~The should justify continued operation of the plants.~~ (He) 8/31/89

Operational Limitations

12 S. Kant 18-30-89
PRS Engineer Date
Raymond R. Hooper 8/31/89
Supervisor, PRS Date

Distribution:
Original - PRS CAQR Files
Site CAQ Coordinator
1536A/naw

FI000255

APPENDIX L
Page 6 of 7

Attachment 3
Assessment of Reportability

CAQR No. SQP890457 Revision 0

Reportability Assessment Revision 0

REPORTABILITY EVALUATION:

Not Reportable

Reportable
PRO No. 1-89-187

Basis for Reportability

Determination: 10 CFR 50.73 2 i B

The plant was in a condition prohibited by the Plants
Technical Specifications SR 9.8.10.1.2.

S. K. [Signature] 18-28-89
PRS Engineer Date

Howard [Signature] 1/29/89
PRS Supervisor Date

Distribution:
Original - PRS CAQR Files
Site CAQ Coordinator

F1000256

GA/ljs

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890920U0810

S24 89 09 19 722

 **Gilbert/Commonwealth** engineers and consultants

GILBERT/COMMONWEALTH, INC., One Northgate Park, Chattanooga, TN 37415/Tel 615-874-0600

September 15, 1989

GC/SQN - 1419
Contract No. - TV72370A
RTP - R0112

Mr. Donald E. Baker, Jr.
P. O. Box 2000
Sequoyah Nuclear Plant
Soddy-Daisy, TN 37379

Re: Change Proposal 1
SQN DC-V-13.8 Criteria
Justification
TAO T0092-391342

Dear Mr. Baker:

Attached please find Gilbert/Commonwealth's proposal on the subject task.

Please contact me at (615) 874-0604 if you have any questions.

Very truly yours,



C. L. Oaks
Engineering Manager



W. V. Leininger
Program Director

Attachment

cc: M. A. Gencer
D. L. Muller
L. A. Hanvey
RIMS (+1)
Task File

RECEIVED
Office of Nuclear Power
SEP 19 1989
Contract Ad...
Sequoyah...

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