

RFS 5984  
RIMS NO.

CAQR ✓

PRD

OA  
NQN-OA

NO.

310P8.910.457

50-390-CIV Pet. al

Licensee Exhibit 126

0-Recd

9/9/02

PART A

INITIATION

\*PLANT(S) / ORGS AFFECTED \_\_\_\_\_ \* (1A) UNIT \_\_\_\_\_ \* (2A) SYSTEM \_\_\_\_\_  
 \*(3A) COMPONENT \_\_\_\_\_ \*(4A) VENDOR \_\_\_\_\_ \*(4A) CONTRACT \_\_\_\_\_  
 \*(5A) REQUIREMENT VIOLATED \_\_\_\_\_  
 \*(6A) SOURCE OF REQUIREMENT VIOLATED \_\_\_\_\_ \*(7A) REFERENCE \_\_\_\_\_  
 \*(8A) DESCRIPTION OF CONDITION  
 SAME AS PREVIOUSLY APPROVED  
 \*CAQR OR PRD INITIATED BY \_\_\_\_\_ \*DATE \_\_\_\_\_ \*TEL \_\_\_\_\_ \*INITIATORS ORG \_\_\_\_\_  
 \*DATE / TIME CAQ DISCOVERED \_\_\_\_\_ \*DATE OF CAQ OCCURRENCE, IF KNOWN \_\_\_\_\_  
 (9A) POTENTIALLY AFFECTS OPERABILITY YES  NO  SPECIFY PLANTS \_\_\_\_\_  
 \*(10A) ABNORMAL EVENT YES  NO  (11A) HARDWARE CAQR YES  NO  POSSIBLE   
 \*(12A) RESPONSIBLE ORGANIZATION \_\_\_\_\_ \*COORDINATED WITH \_\_\_\_\_ DATE \_\_\_\_\_  
 \*(13A) MANAGEMENT REVIEWER \_\_\_\_\_ \*DATE: \_\_\_\_\_ \*TITLE: \_\_\_\_\_  
 \*CAQ COORDINATOR \_\_\_\_\_ \*DATE RECEIVED: \_\_\_\_\_

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 \_\_\_\_\_  
 (6B) ROOT CAUSE ANALYSIS REQUIRED YES  NO  SPECIFY APPARENT CAUSE BELOW  OR PART D   
 (7B) SAFETY EVALUATION REQUIRED YES  NO   
 (8B) ASME. YES  NO  IF YES, III  OR XI  (9B) HARDWARE CAQR YES  NO   
 \*(10B) DESCRIPTION OF CORRECTIVE ACTION AND SCHEDULED COMPLETION DATE \_\_\_\_\_

CLOSE CAQR AS REDUNDANT WITH LER 327/89025  
 attached. Donald G. Amos 9/15/89  
 890920U0809 (20)

TVA Exh. 126

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

APPROVAL	NAME	INIT	DATE		NAME	INIT	DATE
*PREP	DONALD G. AMOS	DA	9/15/89	AIA (ACCEPTANCE)	NA		
*SUPV	DON E. ADAMS II	DEA	9/15/89	PORC (REVIEW)	NA		
MRC	MARK E. REINDERS	MR	9/15/89	PLT MGR (APPROVAL)	NA		
				RIMS NO:	NA		FI000002

PART C

CLOSURE

\* (1C) CORRECTIVE AND PREVENTIVE ACTION COMPLETE NA \*DATE NA  
 \*(2C) VERIFICATION NA \*(3C) VERIFIED COMPLETED BY NA \*DATE NA  
 AIA VERIFICATION NA DATE NA (4C) TAGS REMOVED BY NA DATE NA  
 \*CAQ COORDINATOR CLOSED JOHN M. STUTT DATE 9/17/89

TVA 19584 (ONP 5-88)

RIMS 13 89 05 10 802

LINE ITEMS MARKED WITH AN ASTERISK "\*" REQUIRE COMPLETION IF PRD BLOCK IS MARKED

Template = SECY-028

SECY-02

CLEAR REGULATORY COMMISSION

Word No. <sup>791</sup> 01-~~791~~-01 Order No. TVA 126

In the matter of TVA

Staff \_\_\_\_\_ IDENTIFIED

Applicant \_\_\_\_\_ RECEIVED

Intervenor \_\_\_\_\_ REJECTED \_\_\_\_\_

Other \_\_\_\_\_ WITHDRAWN \_\_\_\_\_

DATE 9-9-02 Witness Buczyński

Clerk R. Davis

DOCKETED  
USNRC



2003 MAR 11 AM 9:00

OFFICE OF THE SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

1 General Instructions -

- A CAQR and PRD numbers and revision levels are assigned and completed only by the CAQ coordinator. A PRD number will have a "P" designation in the last position of the number (e.g. - CHS880121P)
- B "CAQR or PRD Initiated By," "Management Reviewer," "Corrective Action Complete," "Verified Complete," "Closure," and all approvals shall be noted by typed or printed name followed by signature or initials
- C Unused approval blanks shall be marked NA by the CAQ coordinator at closure
- D When more than one organization is required to sign the CAQR or PRD, the additional signatures and dates shall be recorded either in the extra approval blanks on the CAQR-PRD form or on a continuation sheet attached to the CAQR.

2 Specific Instructions for Numbered Blanks -

• Part A

Initiator

- 1A Identify whether the unit is 1, 2, 3, common or all
- 2A Use system designation (reference TROI User's Guide)
- 3A Identify the name of the unique identifier of the component.
- 4A To be completed where hardware or contractor services are involved. Especially important for trending vendor performance where the vendor is at fault
- 5A Identify the requirement violated. Record the words from the procedure, instruction, regulation, etc.
- 6A Identify the source of the requirement violated. Record the document and section where the requirement is located
- 7A Identify if the CAQR or PRD is initiated as a result of a walkdown, employee concern, DNE-EA or DNQA audit, NMRG finding, ASME survey, ISEG Report, OIG Report, corporate assessments, generic review, document review, INPO finding. If the CAQR is initiated as a result of a document review, reference the name and/or number of the document (e.g., generic CAQR). The reference may also include a work control identification number
- 8A Information shall be described in sufficient detail to determine the precise scope of impact on the plant. Information, if known such as items affected, failure modes, and known consequences, shall be provided. Include, as appropriate, drawing numbers, specifications, report numbers, procedure numbers, or any other document providing information pertinent to the CAQR. The description of the CAQ may include the location, type of condition, quantity of items, and any special identification numbers such as heat, lot, mark, model, serial, drawing, or system. Attach applicable figures, tables, or other supporting information.

Management Reviewer

- 9A Indicate if operability is potentially affected. Identify the affected plants with an OL. Information copy of the CAQR may be sent to plants with a CP
- 10A Indicate if the CAQ is an abnormal event identified in Appendix H. If "yes" process in accordance with Appendix G
- 11A If the CAQR documents a hardware problem mark the "Yes" block. If the CAQR has the potential to affect hardware, mark the "possible" block otherwise mark the "no" block
- 12A Designate the Responsible Organization by organization (e.g., SQM) and Group (e.g., MMG) using the TROI User's Guide
- 13A Attests that the responsibilities of subsection 3.2 have been met

• Part B

SQM's Organization

- 1B Where the hardware is affected, indicate if tagging is required

Responsible Organization

- 2B Identify whether CAQR is potentially reportable in accordance with Appendix H. If potentially reportable, identify criterion from Appendix H on which evaluation was based and attach the Potential Reportability Evaluation sheet (last sheet to Appendix H) to the CAQR
- 3B If repetitive occurrences of the CAQ occur or are likely to occur during the time the corrective action is being developed and approved, indicate the interim actions taken.
- 4B If the item requires an "accept-as-is" or "repair" disposition from a design engineering specified requirement, DNE may complete Part E, Engineering Evaluation and Approval sheet, of the CAQR in accordance with the instructions contained in DNE procedures.
- 5B Indicate if a review for generic implications is required. If response is "yes," a root cause analysis is required. Indicate to whom the CAQR is sent to perform the generic review (i.e., DNE-EA [Knoxville] or DNLRA [Chattanooga]) see subsection 2.9.4 C for additional requirements.
- 6B "Yes" response is required for all significant and non-significant CAQRs determined to be potentially generic and affect operability. If "yes", initiate Part D, "Cause Analysis and Corrective Action Continuation" sheet. Specify the apparent cause of the CAQ. If a root cause analysis is not performed, (The QA organization shall assign an Apparent Cause Trend Code)
- 7B For units with an OL, indicate if a safety evaluation is required. A safety evaluation is required if the CAQR identifies a Plant/SAR Discrepancy (see definition in Appendix B).
- 8B Indicate if the CAQ identifies an ASME Section III or Section XI Code item or activity. If "yes", AIA exception and verification of the corrective action is required for closure
- 9B If the CAQR is confirmed to affect hardware, mark the "yes" block. Otherwise, mark the "no" block
- 10B As appropriate, include a full discussion of the design changes made, revision made to existing specifications, training (the target audience shall be delineated in the response), issuance of new specifications, and other similar information. Also address preventive actions.
- 1C Responsible Organization

Indicate that the corrective and preventive action is complete

- 2C "In-house" verification by a knowledgeable individual not responsible for implementing the corrective action. (Reference subsection 2.10.4.A)
- 3C Independent Verification

DNQA or DNE-EA shall perform an independent verification (reference subsection 2.16.1.A)

- 4C DNQA (SQM)

If block 1B indicates that nonconforming lags have been placed, indicate that the lags have been removed

F1000003

STO 890914 816  
TENNESSEE VALLEY AUTHORITY

6N 38A Lookout Place  
September 14, 1989

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

Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 1 - LOCKET NO.  
50-327 - FACILITY OPERATING LICENSE DPR-77 - LICENSEE EVENT REPORT (LER)  
50-327/89025

The enclosed LER provides details concerning the failure to sample the diesel generator (D/G) fuel oil in accordance with technical specifications (TSs). This resulted in all four D/Gs being declared inoperable. This event is considered as an operation prohibited by TS requirements, and is being reported in accordance with 10 CFR 50.73, paragraph a.2.i.b.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
J. R. Bynum, Vice President  
Nuclear Power Production

Enclosure

cc (Enclosure):

Regional Administration  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region II  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30323

INPO Records Center  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
Atlanta, Georgia 30339

NRC Resident Inspector  
Sequoyah Nuclear Plant  
2600 Igou Ferry Road  
Soddy Daisy, Tennessee 37379

F1000004

U.S. Nuclear Regulatory Commission

September 14, 1989

JTL:CAV:MAC:GC

cc: RIMS, MR 4N 72A-C (Enclosure)  
M. J. Burzynski, O&PS-4, Sequoyah (2) (Enclosure)  
D. L. Conner, MBC 07-PTC (Enclosure)  
(Attn: C. T. Benton)  
S. W. Crowe, SB-1, Sequoyah  
D. E. Douthit, Watts Bar  
W. H. Hannum, BR 1N 77B-C (Enclosure)  
N. C. Kazanas, LP 4N 45A-C  
F. D. Kelly, PMA-E, Browns Ferry (Enclosure)  
J. T. LaPoint, O&PS-4, Sequoyah (Enclosure)  
M. O. Medford, LP 6N 38A-C  
M. J. Ray, LP 5N 157B-C (Enclosure)  
P. G. Trudel, DSC-E, Sequoyah  
C. A. Vondra, POB-2, Sequoyah (Enclosure)  
(Attn: T. J. Holloman)

0555h

FI000005

3 - 19

# LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P 530), U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104) OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20503

FACILITY NAME (1)

Sequoyah Nuclear Plant, Unit 1

DOCKET NUMBER (2)

0 5 0 0 0 3 2 7 1 OF 0 5

PAGE (3)

TITLE (4) Inoperability of all four diesel generators resulting from an inadequate procedure

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)							
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)						
0	8	15	8	9	0	2	5	0	0	9	1	4	8	9	Sequoyah, Unit 2	0 5 0 0 0 3 2 8
																0 5 0 0 0

OPERATING MODE (8)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)									
POWER LEVEL (10) 1 0 0	20 402(b)	20 405(c)	80 73(a)(2)(v)	73.71(b)							
	20 405(a)(1)(i)	80 36(e)(1)	80 73(a)(2)(v)	73.71(c)							
	20 405(a)(1)(ii)	80 36(e)(2)	80.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
	20 405(a)(1)(iii)	XX 80.73(a)(2)(i)	80 73(a)(2)(viii)(A)								
	20 405(a)(1)(iv)	80 73(a)(2)(a)	80 73(a)(2)(viii)(B)								
20 405(a)(1)(v)	80 73(a)(2)(ii)	80 73(a)(2)(a)									

LICENSEE CONTACT FOR THIS LER (12)

NAME: J. W. Proffitt, Compliance Licensing Engineer

TELEPHONE NUMBER: 6 1 5 8 4 3 1 - 1 7 4 6 1 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUF TURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUF TURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15)

ABSTRACT (Limit to 1400 spaces i.e., approximately fifteen single space typewritten lines) (16)

On August 15, 1989, at 1109 EDT, with Units 1 and 2 in Mode 1 (100 percent power, 2,235 psig, and 578 degrees Fahrenheit), all four emergency diesel generators (D/Gs) were declared inoperable. The D/Gs were declared inoperable because the D/G fuel oil had not been sampled in accordance with Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2 (i.e., a representative sample was not obtained in accordance with American Society of Testing Materials (ASTM) Standard ASTM D270-1975).

This condition was identified during an evaluation of a nuclear experience review report concerning a problem another nuclear power facility encountered in obtaining representative samples of D/G fuel oil. During the evaluation, it was determined that the sample method being used was inadequate.

The root cause of the event was an inadequate procedure resulting from the failure of Chemistry personnel to incorporate ASTM D270-1975 requirements into the procedure. Corrective actions included obtaining samples in accordance with TS requirements. The samples were analyzed and determined to meet the acceptance criteria except for Tank 2A-A. After the initial samples were obtained, water, sludge, and particles were removed from the tanks, and additional samples were obtained. The second sample from the 2A-A tank was analyzed and determined to meet the acceptance criteria. TVA will revise Technical Instruction 16 and Surveillance Instruction 116 to ensure the D/G fuel is sampled in accordance with ASTM D270-1975 by September 23, 1989.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Sequoyah Nuclear Plant, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 2 7	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 9	0 2 5	0 0	0 2	OF	0 5

TEXT (If more space is required use additional NRC Form 366A's) (17)

Description of Event

On August 15, 1989, at 1109 Eastern daylight time (EDT), with Units 1 and 2 in Mode 1 (100 percent power, 2,235 pounds per square inch gauge, and 578 degrees Fahrenheit [F]), all four emergency diesel generators (D/Gs) (EIIS Code KP) were declared inoperable. The D/Gs were declared inoperable because the fuel oil had not been sampled in accordance with Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.

TS SR 4.8.1.1.2 requires each D/G set to be demonstrated operable at least once every 92 days or before the addition of new fuel oil to the 7-day fuel oil tanks. This is achieved by verifying that a fuel oil sample obtained in accordance with American Society for Testing Materials (ASTM) Standard ASTM D270-1975 has a water and sediment content of less than or equal to 0.05 volume percent and a kinematic viscosity at 100 degrees F of greater than or equal to 1.8 but less than or equal to 5.8 centistokes when tested in accordance with ASTM D975-77. Further, the fuel oil sample is required to have an impurity level of less than 2 milligrams of insolubles per 100 milliliters when tested in accordance with ASTM D2274-70. ASTM D270-1975 specified using the bottle sampling or tap sampling methods when sampling the subject tanks. Each SQN 7-day fuel oil tank consists of four cylindrical tanks connected at each end, both top and bottom, by a 12-inch section of pipe with the fuel oil transfer pump injecting into Tank No. 3 and the recirculation line taking suction from Tank No. 2 (refer to the attached diagram). The tap method is not possible because no taps are installed on the SQN tanks. Sampling of the D/G fuel oil storage tank has been accomplished in the past by drawing a sample from the recirculation header of the fuel oil transfer pump after recirculation for two tank volumes of the contents of the tanks. This method of sampling is not explicitly delineated in accordance with ASTM D270-1975. Prior to this investigation, it was believed that this method met the intent of ASTM D270-1975 to obtain a representative sample by mixing the contents of the container (tank) prior to sampling.

This condition was identified during an evaluation of a nuclear experience review report concerning a problem another nuclear power facility encountered in obtaining representative samples of D/G fuel oil. During the evaluation, it was determined that the sampling method being used was inadequate, in that only a portion of the two center tanks were recirculated; accordingly, the sample being taken was not representative of fuel oil in the entire 7-day tank (i.e., the two outboard tanks).

Because the above-described TS SR had not been performed correctly, all four D/Gs were declared inoperable. On August 15, 1989, at 1109 EDT, Limiting Condition for Operation (LCO) 3.8.1.1.d was entered for failure to adequately verify the D/G fuel oil meets the requirements specified in SR 4.8.1.1.2.c (i.e., failure to obtain a representative sample). SR 4.0.3 states that failure to perform a SR within the allowed surveillance interval constitutes noncompliance with the operability requirements for the LCO. The time limits of the action requirements are applicable at the time it is identified that an SR has not been performed. SR 4.0.3 further allows the action requirements to be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action requirements are less than 24 hours.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 5 0 0 0 3 2 7	8 9	0 2 5	0 0	6 3	OF 0 5

TEXT (If more space is required, use additional NRC Form 368A's) (17)

Description of Event (continued)

The D/G fuel oil storage tanks were sampled at 1900 EDT, on August 15, 1989, in accordance with ASTM D270-1975. This was accomplished by removing the manhole covers from each of the fuel oil tanks, then obtaining conservative samples. Following completion of the initial sample collection, water, sludge, and particles were removed from the tanks, and additional samples were taken. The results of the initial samples for the water and sediment analysis and the viscosity analysis were completed at 2130 EDT. The results showed that the fuel oil met the acceptance criteria with the exception of Tank 2A-A, which failed to meet the water and sediment limit. D/G 2A-A was considered inoperable (i.e., for failure of the water and sediment analysis), and the action requirements of LCO 3.8.1.1 were already being complied with in that the offsite power source was demonstrated operable. The results of the second sample for Tank 2A-A were obtained at 2315 EDT, and the water and sediment analysis met the acceptance criteria. The insolubles analysis was not yet completed at this time.

On August 16, 1989, at 1109 EDT, while awaiting results of the insolubles analysis, the 24-hour delay provided by SR 4.0.3 expired, and the time limits of the action requirements of LCOs 3.8.1.1.d and 3.0.5 were implemented. At this time, with all four D/Gs declared inoperable, a notification of unusual event (NOUE) was declared, all four high-pressure fire pumps were declared inoperable, and LCO 3.7.11.1 was entered. NRC was notified at 1129 EDT of the NOUE. At this time, the water and sediment analysis and viscosity analysis for all four D/Gs met the acceptance criteria. The insolubles analysis had not been completed. At 1430 EDT, the insolubles analysis was completed and showed that the D/G fuel oil was within the limits for all tanks. LCOs 3.8.1.1.d, 3.7.11.1, and 3.0.5 were exited at 1451 EDT, and the NOUE was terminated.

Cause of Event

The root cause of this event was determined to be an inadequate procedure resulting from failure of Chemistry personnel to perform an adequate technical review of both ASTM requirements and TSs and, accordingly, failed to determine that this method would not produce a representative sample.

Analysis of Event

This event is being reported in accordance with 10 CFR 50.73, paragraph a.2.i.B, as an operation that is prohibited by the plant's TS.

Although the D/Gs were declared inoperable, they were not removed from service or isolated from their respective emergency power busses; there was no clear evidence that the D/Gs would not have been able to perform their design safety function. The ability of three of the D/Gs to operate was confirmed when the results of the fuel oil analysis were determined acceptable for the associated 7-day fuel oil storage tanks. There is no clear evidence that the out-of-limit water and sediment analysis for D/G 2A-A would have prevented it from performing as required. Additionally, there has never been any D/G 2A-A performance deficiency identified resulting from poor fuel quality. Thus, it is believed that the D/Gs could have supplied emergency power, if required, and performed their safety-related function.

F100000E

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Sequoyah Nuclear Plant, Unit 1	DOCKET NUMBER (2) 0   5   0   0   0   3   2   7	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8   9	-   0   2   5	-   0   C	0   4	OF 0   5

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Corrective Actions

Immediate corrective actions were to sample the 7-day tank in accordance with ASTM D270-1975. This was accomplished by removing the manhole covers from each of the D/G fuel oil storage tanks, then obtaining the samples. After the initial samples were obtained, water, sludge, and particles were removed from the tanks; then, additional samples were obtained. The initial samples were analyzed and determined to meet the acceptance criteria except for D/G Tank 2A-A. The second sample for D/G Tank 2A-A was analyzed and determined to be within the acceptance criteria.

The actions to prevent recurrence will include revising Technical Instruction (TI) 16, "Sampling Methods," and Surveillance Instruction (SI) 116, "Quarterly Chemistry Requirements on Diesel Generator Fuel Oil," to specify sampling of the D/G fuel oil in accordance with ASTM D270-1975. These procedures will be revised before the next performance. This event will be discussed with Chemistry personnel who perform procedure revisions to ensure referenced documents are reviewed during technical evaluations of procedures.

Commitments

1. TVA will revise TI-16 to specify that the D/G fuel oil storage tanks will be sampled in accordance with ASTM D270-1975 by September 23, 1989.
2. TVA will revise SI-116 to specify ASTM D270-1975 as the method to sample and test the D/G fuel oil by September 23, 1989.
3. LER 327/89025 will be discussed with Chemistry personnel who perform procedure revisions to ensure referenced documents are reviewed during technical evaluations of procedures. This will be completed by October 13, 1989.

Additional Information

There have been 16 LERs previously written as a result of SIs not ensuring compliance with TSs--SQN-50-327/86001, 86013, 86028, 86030, 86035, 86039, 86040, 86040, 86044, 86050, 87002, 87007, 87008, 87009, SQN 50-328/86006, and 86007. The corrective actions associated with the above LERs, resulting from SQN's SI review program, should have identified this problem; but for the previously described reasons, it was believed that the intent of ASTM D270-1975 was being met.

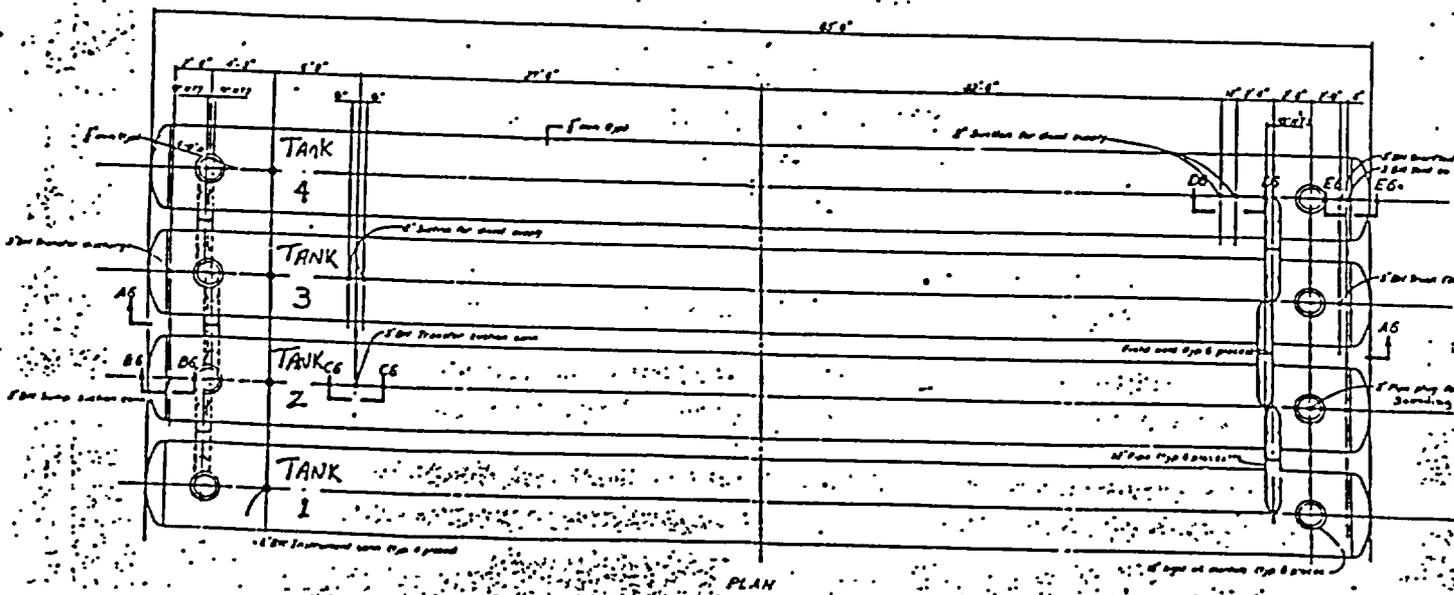
F1000009

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# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Sequoyah Nuclear Plant, Unit 1	DOCKET NUMBER (2)  0 5 0 0 0 3 2 7	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 9	0 2 5	0 0	0 5	OF 0 5

TEXT (If more space is required, use additional NRC Form 366A's) (17)



F1000010

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LICENSING TRANSMITTAL TO NRC  
SUMMARY AND CONCURRENCE SHEET

DATE TRANSMITTED  
TO MJR \_\_\_\_\_

THE PURPOSE OF THIS CONCURRENCE SHEET IS TO ASSURE THE ACCURACY AND  
COMPLETENESS OF TVA SUBMITTALS TO THE NRC.

DATE \_\_\_\_\_ DATE DUE NRC 9/14/89 - C ACTION NO. \_\_\_\_\_

SUBMITTAL PREPARED BY J. W. Proffitt, Jr. FEES REQUIRED YES \_\_\_\_\_ NO X

PROJECT/DOCUMENT I.D. Sequoyah Nuclear Plant (SQN) - Licensee Event Report  
(LER) 50-327/89025

PURPOSE/SUMMARY To provide NRC with LER 327/89025 concerning failure to sample  
the diesel generator (D/G) fuel oil in accordance with technical specification  
(TS) requirements.

RESPONDS TO \_\_\_\_\_ (RIMS NO.) COMPLETE RESPONSE YES X NO \_\_\_\_\_

PROBLEM OR DEFICIENCY DESCRIPTION Failure to properly sample the D/G fuel oil  
resulted in all four D/Gs being declared inoperable. This event is considered  
as an operation prohibited by TSs.

CORRECTIVE ACTION/COMMITMENT TVA will revise Technical Instruction 16,  
"Sampling Methods," and Surveillance Instruction 116, "Quarterly Chemistry  
Requirements on Diesel Generator Fuel Oil," to specify sampling of the D/G  
fuel oil in accordance with American Society for Testing Materials (ASTM)  
Standard ASTM D270-1975, thus ensuring TS compliance.

INDEPENDENT REVIEW \_\_\_\_\_ DATE \_\_\_\_\_

A concurrence signature reflects that the signatory has assured that the  
submittal is appropriate and consistent with TVA policy, applicable  
commitments are approved for implementation, and supporting documentation for  
submittal completeness and accuracy has been prepared.

CONCURRENCE

NAME	ORGANIZATION	SIGNATURE	DATE
J. R. Bynum	VP NPP	<i>[Signature]</i>	9/14/89
J. T. LaPoint	SQN Site Director	<i>[Signature]</i>	9/14/89
C. A. Vondra	SQN Plant Manager	<i>[Signature]</i>	9/12/89
PORC Chairman		<i>[Signature]</i>	9/13/89
CLH M. J. Burzynski	SQN Site Licensing Mgr	<i>[Signature]</i>	9-13-89

APPROVED \_\_\_\_\_ DATE \_\_\_\_\_

NLRA MANAGER

0555h

FIC00011

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Sequoyah Site Licensing

Concurrence Sheet

DUE TO NTD \_\_\_\_\_ DATE DUE NRC 9/14/89 - C

PROJECT/DOCUMENT I.D. Sequoyah Nuclear Plant (SQN) - Licensee Event Report  
(LER) 50-327/89025

CONCURRENCE

NAME	ORGANIZATION	SIGNATURE OR LETTER REFERENCE	DATE
J. W. Proffitt	SQN Licensing Engineer	<i>James W. Proffitt</i>	9/13/89
M. A. Cooper	SQN Compliance Lic Mgr	<i>M. A. Cooper</i>	9/13/89
J. S. Smith	SQN Site Lic	<i>J. S. Smith</i>	9/13/89
W. L. Byrd	SQN Proj Cōnt/Fin Svs Mgr	<i>W. L. Byrd</i>	9/13/89
G. L. Fiser	SQN Chemistry Supt	<i>G. L. Fiser</i>	9/13/89 fjd
W. R. Lagergren	SQN Operations Mgr	<i>W. R. Lagergren</i>	9/13/89

NRC response or approval required? \_\_\_ Yes X No

\*\*\*NOTE: This sheet should be removed by Corporate Licensing upon receipt.\*\*\*

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PART A INITIATION

\*PLANT(S)/ORGS AFFECTED Sequoyah \* (1A) UNIT 112 \* (2A) SYSTEM 18  
 \*(3A) COMPONENT 7-Day Diesel Fuel Storage Tank \*(4A) VENDOR N/A \*(4A) CONTRACT N/A  
 \*(5A) REQUIREMENT VIOLATED At least once in 92 days and from new fuel oil prior to addition to the 7-day tanks by verifying that a sample obtained in accordance with ASTM-D270-1975 (cont pg)  
 \*(6A) SOURCE OF REQUIREMENT VIOLATED Technical Specification SR 8.3.1.1.2.C \*(7A) REFERENCE NEK OE-3491  
 \*(8A) DESCRIPTION OF CONDITION Technical Specification SR 8.3.1.1.2.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  
 \*CAOR OR PRD INITIATED BY Don Amos DATE 8/14/89 \*TEL 6930 \*INITIATORS ORG. SGO-CEM  
 \*DATE/TIME CAQ DISCOVERED 8/14/89 1900 \*DATE OF CAQ OCCURRENCE, IF KNOWN 8/14/89 1500

(9A) POTENTIALLY AFFECTS OPERABILITY: YES  NO  SPECIFY PLANTS SON Unit 112  
 \*(10A) ABNORMAL EVENT YES  NO  (11A) HARDWARE CAOR YES  NO  POSSIBLE   
 \*(12A) RESPONSIBLE ORGANIZATION SGO/CEM Chem Dept COORDINATED WITH Don Amos DATE 8/14/89  
 \*(13A) MANAGEMENT REVIEWER MARK E. REINDERS MRL \*DATE: 8/17/89 \*TITLE: QUALITY TRACK FINAL SJAV  
 \*CAQ COORDINATOR ALESIA C. JUSTICE GGG \*DATE RECEIVED: 8/17/89

PART B CORRECTIVE ACTION

(1B) TAGS REQUIRED (BY DNQA[SOM]) 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 \_\_\_\_\_  
 (6B) ROOT CAUSE ANALYSIS REQUIRED: YES  NO  SPECIFY APPARENT CAUSE BELOW  OR PART D   
 (7B) SAFETY EVALUATION REQUIRED YES  NO  Sec FER # II-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

1. If following instructions will be revised to ensure that sampling of diesel fuel will be done in accordance with ASTM D270-1975; TI-6, TI-37, and SI-116.
2. 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.
3. The design of the seven-day storage tanks will be evaluated for possible changes to facilitate sampling and enhance recirculation (design change request will be submitted)

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>DD</u>	<u>9/11/89</u>	AIA (ACCEPTANCE)			
*SUPV	<u>DON E. ADAMS</u>	<u>DEA</u>	<u>9/11/89</u>	POPC (REVIEW)			
				PLT MGR (APPROVAL)			
				RIMS NO	<b>F1000013</b>		

PART C CLOSURE

\*(1C) CORRECTIVE AND PREVENTIVE ACTION COMPLETE \_\_\_\_\_ \*DATE: \_\_\_\_\_  
 \*(2C) VERIFICATION SGO/CEM \*(3C) VERIFIED COMPLETED BY \_\_\_\_\_ \*DATE: \_\_\_\_\_  
 AIA VERIFICATION \_\_\_\_\_ DATE: \_\_\_\_\_ (4C) TAGS REMOVED BY \_\_\_\_\_ DATE: \_\_\_\_\_  
 \*CAQ COORDINATOR CLOSED \_\_\_\_\_ DATE: \_\_\_\_\_



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: [Signature] Date: 8-28-89

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

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

TREND DATA: BASIC CAUSE CODE CW CAUSING ORG SQD ICM 1

SEVERITY LEVEL IV
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APPENDIX H  
Page 12 of 12

POTENTIAL REPORTABILITY EVALUATION

Potentially Reportable:	If Yes, Specify Applicable			
	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. SAP890457 Evaluator *Donald J. Am* Date 8/25/09

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

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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

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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  <sup>8-30-87</sup>

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 <sup>correctly</sup> 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] 8-30-87  
PRS Engineer Date

[Signature] 8/31/87  
Supervisor, PRS 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. 599890457 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~~ <sup>water</sup> contaminants. Representative samples taken from the bottom, middle & top of tanks were in Tech Spec limits when tested.

Site procedure that will be revised to ensure conformance with ASTM D270-1975 spec: TI-16, TI-37 & SI-116. Design will also be evaluated of a possible design change. Revision to procedure should be made by 9-27-89.

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

~~The should justify continued operation of the tanks.~~ (H) 8/31/89

Operational Limitations

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

12 - S. Kent 18-30-89 Howard Meyer 8/31/89  
PRS Engineer Date Supervisor, PRS Date

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

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APPENDIX L  
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Attachment 3  
Assessment of Reportability

CAQR No. 5QP890457 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 4-B.1.0.1.2.2

[Signature]  
PRS Engineer      18-25-89  
Date

[Signature]  
PRS Supervisor      1/29/89  
Date

Distribution:  
Original - PRS CAQR Files  
Site CAQ Coordinator

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