

February 6, 1990

To Dennis Rathbun
From Henry Myers *HM*

Re: EN NBR 17640, Sequoyah Appendix R

The subject EN (attached hereto) concerns the recent discovery of Appendix R problems at Sequoyah.

Please provide followup documents to the subject EN.

The subject EN gives rise to the following questions:

- A. Why were these problems not discovered during the reviews conducted during the period when Sequoyah was shutdown between 1985 and 1988?
- B. How do the findings described in the subject EN affect the conclusion stated in SECY-88-11:

The staff finds that Sequoyah now has an acceptable fire protection program and is in compliance with Appendix R?

- C. What is the relationship between the problems identified in the subject EN and the issues raised by Andrew Bartlik in 1987-88, the Appendix R questions posed by the NRC to TVA on February 26, 1988, and TVA's answers to these questions?
- D. What reviews have been conducted by NRC staff of Appendix R related materials discussed during the Bartlik Department of Labor proceeding? What were the results of such reviews? [Please note that on December 21, 1988 we informed John Bradburne via memorandum that significant information concerning compliance with Appendix R at Sequoyah and/or licensee integrity had been introduced at the Bartlik proceeding and that certain of these documents had not been turned over to the NRC. We stated that in view of the regulatory significance of such documents, we believed it important that these documents be reviewed by the NRC.]
- E. Does the NRC staff believe that Sequoyah Units 1 and 2 are currently in compliance with Appendix R?

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PDR ADOCK 05000259
P FDC

----- Event Notification - Power Facilities -----

EN NBR : 17640
 FACILITY/SITE NAME : SEQUOYAH
 UNIT NBR : 1 2
 DOCKET NBR: 050 - 00327 050 - 00328 050 -
 RX TYPE : W-4-LP W-4-LP

NOTIFY DATE: 01 / 26 / 1990
 NOTIFY TIME: 14:01
 EVENT DATE : 01 / 26 / 1990
 EVENT TIME : 09:00

REGION : 2
 STATE : TN

EMERGENCY CLASS : Not applicable

10 CFR SECTION : LTR N/A N/A

UNIT	SCRAM CD	RX CRIT	INIT PWR	INIT RX MODE	CURR PWR	CURR RX MODE
1	N	Y	100	Power operation	100	Power operation
2	N	Y	100	Power operation	100	Power operation

LICENSE NBR : DPR 077

DUTY OFFICER: JOHN MACKINNON

NRC NOTIFIED BY: NORM THOMAS

ORGANIZATION

RDO

PERSON NOTIFIED

KEN BARR

----- Description Text -----

VIOLATION OF SECTION 2H(APPENDIX R) OF FACILITY LICENSE AGREEMENT DISCOVERED. HAVE NOT MET PHYSICAL SEPARATION REQUIREMENTS AS SPECIFIED PER APPENDIX "R" FOR CABLE SEPARATION OF REACTOR COOLANT SYSTEM COMPONENTS. DUE TO AN ERROR IN APPENDIX "R" SKETCH DRAWINGS, SEVERAL CABLES ON EACH UNIT FAILED TO MEET APPENDIX "R" REQUIREMENTS. THESE CABLES ARE ASSOCIATED WITH VALVES IN THE REACTOR COOLANT SYSTEM LETDOWN PATHS FOR BOTH UNITS. THESE CABLES ARE LOCATED IN THE ELEVATION 749' MECHANICAL EQUIPMENT ROOMS. ONE MECHANICAL EQUIPMENT ROOM FOR EACH UNIT HAS THE FOLLOWING CABLES RUNNING THROUGH THEM:

- ALL 3 NORMAL LETDOWN ISOLATION VALVES FOR THE CVCS SYSTEM
- ONE EXCESS LETDOWN VALVE
- 2 REACTOR HEAD VENT ISOLATION VALVES
- PRESSURIZER PORV ISOLATION VALVE

THE CABLES FOR THE REACTOR COOLANT SYSTEM EQUIPMENT LISTED ABOVE DO NOT MEET THE PHYSICAL SEPARATION REQUIREMENTS OF APPENDIX "R". INVESTIGATION OF THE ABOVE STATED PROBLEM IS IN PROGRESS AT THIS TIME. THEY HAVE ENGINEERING ANALYZING THIS PROBLEM AND ENGINEERING WILL PROVIDE A RESOLUTION TO THIS PROBLEM(DID NOT KNOW WHEN THE RESOLUTION WOULD BE ISSUED). THEY HAVE HAD A ROVING FIRE WATCH PATROLLING THE MECHANICAL EQUIPMENT ROOMS ON THE 749' LEVEL SINCE BEFORE RESTART OF UNITS 1 & 2 BACK IN 1989. A WRITTEN REPORT WILL FOLLOW IN THE NEAR FUTURE(LICENSEE DID NOT KNOW IF THIS WOULD BE AN IER). RESIDENT INSPECTOR WILL BE INFORMED BY THE LICENSEE. *** UPDATE DATE :01/29/90 UPDATE TIME:14:57 ***FROM LICENSEE: BY THOMAS *** THE LICENSEE DISCOVERED THAT THREE OF THE ORIGINAL CABLES WERE IDENTIFIED TO HAVE ADDITIONAL CABLE INTERACTION PROBLEMS. THE CABLES WHICH ARE FOR UNIT 2 PZR PORV 2-PCV-68-334 AND THE ASSOCIATED PORV BLOCK VALVE 2-FCV-68-333 WERE FOUND TO NOT MEET APPENDIX R REQUIREMENTS. THUS A FIRE IN UNIT 2 ELEVATION 749 MECHANICAL ROOM COULD AFFECT BOTH THE PORV AND ITS ASSOCIATED BLOCK VALVE AND PREVENT THE CAPABILITY TO MAINTAIN THE RCS PRESSURE BOUNDARY. AN EVALUATION IS UNDER WAY ON HOW TO RESOLVE THIS PROBLEM. THIS COMPLETES THE INVESTIGATION INTO THE LETDOWN LINE CABLE INTERACTION PROBLEM DISCUSSED EARLIER IN THIS EVENT. THE INVESTIGATION INTO THE ROOT CAUSE OF THE APPENDIX R PROBLEM IS CONTINUING. THE RI WILL BE INFORMED.



1. Blaha
2. Mike

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FEB 26 1990

MEMORANDUM FOR: Dennis K. Rathbun, Director
Congressional Affairs, GPA

FROM: James L. Blaha
Assistant for Operations
Office of the Executive Director for Operations

SUBJECT: CORRESPONDENCE FROM CONGRESSIONAL STAFF MEMBER CONCERNING
EN NBR 17640, SEQUOYAH APPENDIX R

Reference: Memorandum from D. K. Rathbun to J. L. Blaha on the same
subject, dated February 7, 1990.

Our responses to Dr. Myers' questions contained in his correspondence of February 6, 1990, are enclosed. The correspondence was attached to the memorandum referenced above.

If you have any questions regarding our responses, contact Jack Donohew, Project Manager for Sequoyah Units 1 and 2, at extension 20703.

James L. Blaha
James L. Blaha
Assistant for Operations
Office of the Executive Director
for Operations

Enclosure:
Responses to Questions

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