

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: SWEC-SQN-03

REPORT TYPE: Sequoyah Nuclear Plant Element

REVISION NUMBER: 0

TITLE: Technical Specification Non-Compliances

REASON FOR REVISION: N/A

SWEC SUMMARY STATEMENT: The items in this report were identified by the Nuclear Regulatory Commission (NRC) and were included in the Stone & Webster Engineering Corporation (SWEC) systematic analysis. All items evaluated within this report were verified to be adequately addressed and SWEC concerns A02840928-001 and -003 were closed by NRC. Concerns A02840928-002 and -004 are now ready for closure.

PREPARATION

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REVIEWS

PEER:

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APPROVED BY:

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CONCURRENCE (FINAL REPORT ONLY)

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WATTS BAR NUCLEAR PLANT
EMPLOYEE CONCERNS TASK GROUP
OTHER SITES
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Element Title: Technical Specification Non-Compliances

SWEC Concerns: A02 840928 002-001
A02 840928 002-002
A02 840928 002-003
A02 840928 002-004

Source Document: NRC Report 50-327/84-20 and 50-328/84-21

Report Number: SWEC-SQN-03

Evaluator:	<u>John Knightly</u> J. J. Knightly	<u>9/12/86</u> Date
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Approved By:	<u>R.C. Sauer</u> R. C. Sauer	<u>7/12/86</u> Date

I. Introduction

During a routine NRC inspection of Sequoyah operational procedures and activities in progress, July 6 through August 5, 1984, the Nuclear Regulatory Commission (NRC) resident identified and reported (reference 1) several violations which were addressed as issues in the Stone & Webster Engineering Corporation (SWEC) systematic analysis, as follows:

- (1) A02840928002-001 (Violation 327/84-20-01, 328/84-21-01), Air Compressor Repair Procedure Lacking.
- (2) A02840928002-002 (Violation 328/84-21-02), Residual Heat Removal (RHR) Valve Lineup Error.
- (3) A02840928002-003 (Violation 328/84-21-03), RHR Degraded Operability Not Reported.
- (4) A02840928002-004 (Violation 328/84-21-05), AI-3 Tagout Requirement Not Implemented.

Information on the background, corrective actions taken, verification methodology, verification analysis, completion status, and pertinent references for these four issues are included in this report.

II. Verification of SWEC Issues

A. A02840928002-001, Air Compressor Repair Procedure Lacking.

1. Background - Appendix A of Regulatory Guide 1.33, Paragraph 9, "Procedures for Performing Maintenance," requires that maintenance that can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with written procedures. The NRC inspector observed that disassembly and repair of the B-B Auxiliary Air Compressor, part of a safety-related system, was being performed using only a maintenance request (MR). Written procedures were not properly established or implemented, resulting in violation 327/84-20-01 and 328/84-21-01.
2. Corrective Actions Taken - Sequoyah Nuclear Plant (SQN) stated (Reference 2) that Maintenance Instruction MI-10.36, Auxiliary Control Air Compressor Rebuild, had been written and Plant Operations Review Committee (PORC) approved to establish procedural controls for the disassembly and reassembly of the auxiliary air compressors, and that this procedure would be issued and used.

3. Verification Methodology - The SWEC concern identified for Employee Concerns Task Group (ECTG) verification was stated as follows:

<u>RIMS NO.</u>	<u>ISSUE</u>	<u>RIMS ITEM</u>
A02840928002	Written procedures were not established in that the disassembly and repair of the AA compressor* was performed using a Maintenance Request.	RIMS-001

*(Wording error: ECTG review of the NRC documentation (reference 1) verified that the BB compressor was the one disassembled and repaired. The AA compressor was not repaired at that time.)

ECTG reviewed the Sequoyah Compliance Licensing files for internal and external correspondence related to this issue, the applicable procedure, and the NRC status and tracking system for the issue. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis - The ECTG review indicated that the NRC violation was adequately resolved as follows: Maintenance Instruction MI-10.36, "Auxiliary Control Air Compressor Rebuild," Revision 0, dated September 17, 1984, included requirements for (a) removal from and return to service (b) use of a MR (c) Quality Control (QC) hold points, and (d) post maintenance testing. The corrective action was found acceptable to the NRC and the violation closed in Report 84-35, (reference 3).
5. Completion Status - Based on SQN corrective action, compliance with requirements, and NRC closure of the item, no further actions on this item are required. This SWEC concern is closed.

B. A02840928002-002, RHR Valve Lineup Error

1. Background - Appendix A of Regulatory Guide 1.33, Paragraph 8, "Procedures for Control of Measuring and Test Equipment and for Surveillance Tests Procedures, and Calibration," required specific procedures for surveillance tests on Emergency Core Cooling Systems (ECCS). However, adequate procedures had not been established. Both trains of the Residual Heat Removal (RHR) System (an ECCS system) were rendered inoperable due to a valve lineup required by procedure SI 267.74.2 (reference 4) which was in technical error. NRC issued Violation 50-328/84-21-02.

2. Corrective Action - SQN stated (reference 2) that a procedure change to SI 267.74.2 was issued July 11, 1984, to correct the valve lineup. Licensee Event Report (LER) SQRO-50-328/84012 was submitted on this event as required by 10 CFR 50.73.
3. Verification Methodology - The SWEC concern identified for ECTG verification was stated as follows:

<u>RIMS NO.</u>	<u>ISSUE</u>	<u>RIMS ITEM</u>
A02840928002	Both trains of the RHR system were inoperable due to a valve lineup error as required by procedure.	RIMS-002

ECTG reviewed the Sequoyah Compliance Licensing files for internal and external correspondence related to this issue, the applicable procedure (reference 4), and the NRC status and tracking system for the issue. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis - The ECTG review indicated that the NRC violation was adequately resolved. Corrective actions outlined in II.B.2, above, including procedural revision and LER issuance, were accomplished. Additionally, the SQN Compliance files indicated that a review of similar instructions pertaining to ASME section XI external leakage inspections had been completed August 13, 1984, to ensure additional improper valve lineups were not being required. The NRC status system did not indicate that any additional NRC review or closure of the item had taken place.
5. Completion Status - Based on the verification activity above, ECTG considers the corrective action taken by SQN complete and the violation ready for NRC closure.

C. A02840928002-003, RHR Degraded Operability Not Reported

1. Background - 10 CFR 50.72 requires reportability of a safety-related event such as the RHR valve lineup error within four hours. Contrary to this, the error was not reported in this timeframe. NRC identified this as a violation (328/84-21-03).
2. Corrective Actions - SQN responded (reference 2) that the event cited was not reported to NRC in compliance with 10 CFR 50.72 because the TVA compliance engineer had decided that the event by itself did not present an immediate safety problem as defined by 50.72, but rather a 50.73 problem not requiring an immediate phone call. The incident was reported accordingly. TVA considered the violation to be an isolated case.

3. Verification Methodology - The SWEC concern identified for ECTG verification was stated as follows:

<u>RIMS NO.</u>	<u>ISSUE</u>	<u>RIMS ITEM</u>
A02840928002	Degraded operability of the RHR system was reported per 10 CFR 50.73 LER, but not with respect to 10 CFR 50.72.	RIMS-003

ECTG reviewed the Sequoyah Compliance Licensing files for internal and external correspondence related to this issue, and the NRC status and tracking system for the issue. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis - The ECTG review indicated that the NRC reportability violation was adequately resolved. The item was closed by the NRC with the statement, "Corrective actions taken appear to be adequate to prevent recurrence; this item is closed" (reference 3, page 2).
5. Completion Status - Based on the NRC closure of this item concerning NRC reportability, the SQN corrective actions on this issue are considered complete. This SWEC concern is closed.

D. A02840928002-004, AI-3 Tagout Requirement Not Implemented

1. Background - Appendix A of Regulatory Guide 1.33, Paragraph 1, "Administrative Procedures", requires development of specific procedures for equipment control (e.g., locking and tagging). Administrative Instruction AI-3 "Clearance Procedure," Section 3.2, requires second person verification for tagging equipment in the Emergency Core Cooling System (ECCS). NRC review of hold order (HO) 934 for the 2A-A centrifugal charging pump (CCP) (part of the ECCS) showed no second person verification for tagging out the pump. NRC issued Violation 50-328/84-21-05.
2. Corrective Actions - The SQN response to the NRC stated that (1) The individual involved in the clearance was given additional training on the double verification requirement of AI-3, (2) Group training covering independent verification was given to other shift engineers during July through August 1984, and (3) A training letter dated October 12, 1984, was circulated to all Operations Personnel requiring acknowledgement of receipt and understanding.

3. Verification Methodology - The SWEC concern identified for ECTG verification was stated as follows:

<u>RIMS NO.</u>	<u>ISSUE</u>	<u>RIMS ITEM</u>
AO2840928002	Administrative Instruction AI-3 implemented in that no second person verification had been conducted for tagging out CCP	RIMS 004

ECTG reviewed the Sequoyah Compliance Licensing files for internal and external correspondence related to this issue, and the NRC status and tracking system for the issue. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis - The ECTG review indicated that corrective actions outlined in II D-2, above, had been accomplished. Twenty-two (22) out of twenty-four (24) shift engineers and assistant shift engineers assigned to shift operations received training in independent verification during the first six week period after the violation. The training letter sent to Operations Personnel included the subjects "Clearance Procedure," "Independent Verification," and the subject of this concern, "NRC Violation 84-21-05."
5. Completion Status - The SQN corrective actions for this issue are considered complete and ready for NRC closure. Following the NRC closure, the SWEC concern may be closed.

III. References

1. NRC Report 50-327/84-20 and 50-328/84-21 Dated September 20, 1984
R. C. Lewis to H. G. Parris (L44 840928 002)
2. TVA Letter, Sequoyah Nuclear Plant - NRC - OIE Region II Inspection Report Numbers 50-327/84-20 and 50-328/84-21, dated November 9, 1984.
3. NRC Report 50-327/328/84-35 dated December 28, 1984
4. TVA Surveillance Instruction SI 267.74.2, Inservice Pressure Testing of RHR System - Outside Containment.