



Tennessee Valley Authority, Post Office Box 2000, Soddy Daisy, Tennessee 37384-2000

June 4, 2010

10 CFR 50.73

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Sequoyah Nuclear Plant, Units 1 and 2
Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Subject: **Licensee Event Report 327 and 328/2010-001, "Inoperability of Shutdown Board Because of Spent Fuel Pool Back-Up Pump Breaker Inoperability"**

The enclosed licensee event report provides details concerning an event where Sequoyah Nuclear Plant, Units 1 and 2 were operated in a condition prohibited by technical specifications. The 480-volt Shutdown Board 2A1-A was considered inoperable as a result of the spent fuel pool back-up pump common spare breaker being inoperable. This report is being submitted in accordance with 10 CFR 50.73 (a)(2)(i)(B).

Respectfully,

Christopher R. Church
Site Vice President
Sequoyah Nuclear Plant

Enclosure:

Licensee Event Report 327 and 328/2010-001, "Inoperability of Shutdown Board Because of Spent Fuel Pool Back-Up Pump Breaker Inoperability"

cc: NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Sequoyah Nuclear Plant

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ENCLOSURE

**LICENSEE EVENT REPORT 327 AND 328/2010-001, INOPERABILITY OF
SHUTDOWN BOARD BECAUSE OF SPENT FUEL POOL BACK-UP PUMP
BREAKER INOPERABILITY**

NRC FORM 366 (9-2007)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 <small>Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</small>		EXPIRES 08/31/2010																																								
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)																																															
1. FACILITY NAME Sequoyah Nuclear Plant (SQN), Unit 1				2. DOCKET NUMBER 05000327		3. PAGE 1 OF 6																																									
4. TITLE: Inoperability of Shutdown Board Because of Spent Fuel Pool Back-Up Pump Breaker Inoperability																																															
5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED																																						
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9. OPERATING MODE 1			11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: <i>(Check all that apply)</i>																																												
10. POWER LEVEL 100			<table style="width:100%; border: none;"> <tr> <td><input type="checkbox"/> 20.2201(b)</td> <td><input type="checkbox"/> 20.2203(a)(3)(i)</td> <td><input type="checkbox"/> 50.73(a)(2)(i)(C)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)</td> </tr> <tr> <td><input type="checkbox"/> 20.2201(d)</td> <td><input type="checkbox"/> 20.2203(a)(3)(ii)</td> <td><input type="checkbox"/> 50.73(a)(2)(ii)(A)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)(A)</td> </tr> <tr> <td><input type="checkbox"/> 20.2203(a)(1)</td> <td><input type="checkbox"/> 20.2203(a)(4)</td> <td><input type="checkbox"/> 50.73(a)(2)(ii)(B)</td> <td><input type="checkbox"/> 50.73(a)(2)(viii)(B)</td> </tr> <tr> <td><input type="checkbox"/> 20.2203(a)(2)(i)</td> <td><input type="checkbox"/> 50.36(c)(1)(i)(A)</td> <td><input type="checkbox"/> 50.73(a)(2)(iii)</td> <td><input type="checkbox"/> 50.73(a)(2)(ix)(A)</td> </tr> <tr> <td><input type="checkbox"/> 20.2203(a)(2)(ii)</td> <td><input type="checkbox"/> 50.36(c)(1)(ii)(A)</td> <td><input type="checkbox"/> 50.73(a)(2)(iv)(A)</td> <td><input type="checkbox"/> 50.73(a)(2)(x)</td> </tr> <tr> <td><input type="checkbox"/> 20.2203(a)(2)(iii)</td> <td><input type="checkbox"/> 50.36(c)(2)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)(A)</td> <td><input type="checkbox"/> 73.71(a)(4)</td> </tr> <tr> <td><input type="checkbox"/> 20.2203(a)(2)(iv)</td> <td><input type="checkbox"/> 50.46(a)(3)(ii)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)(B)</td> <td><input type="checkbox"/> 73.71(a)(5)</td> </tr> <tr> <td><input type="checkbox"/> 20.2203(a)(2)(v)</td> <td><input type="checkbox"/> 50.73(a)(2)(i)(A)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)(C)</td> <td><input type="checkbox"/> OTHER</td> </tr> <tr> <td><input type="checkbox"/> 20.2203(a)(2)(vi)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)(D)</td> <td style="font-size: small;">Specify in Abstract below or in NRC Form 366A</td> </tr> </table>									<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A
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12. LICENSEE CONTACT FOR THIS LER																																															
NAME Scott Bowman								TELEPHONE NUMBER (Include Area Code) 423-843-6910																																							
13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT																																															
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) On April 5, 2010 at 1145 Eastern Daylight Time (EDT), Electrical Maintenance notified Operations that the spent fuel pool (SFP) back-up pump common spare (C-S) breaker had been installed, following repairs, without the required arc chutes and phase barriers. As a result, the breaker for the SFP back-up pump was declared inoperable and the associated Shutdown Board 2A1-A was considered inoperable. Main control room operators entered Technical Specification (TS) Limiting Condition for Operation (LCO) 3.8.2.1, Action a, due to the inoperability of the 480-volt Shutdown Board 2A1-A. After successfully disconnecting and racking out the SFP back-up pump C-S breaker, TS LCO 3.8.2.1, Action a, was exited. The direct cause was Electrical Maintenance personnel failed to install the SFP back-up pump C-S breaker arc chutes and phase barriers. The Electrical Maintenance technician failed to stop upon identifying inadequacies in the work order. Corrective actions included applying appropriate disciplinary actions. The root cause of the event was determined to be that a less than adequate process exists for conducting technical reviews. The steps required to return the breaker to an operable state were omitted from the work order and were not noted during the technical review of the work order. Corrective actions include revising the applicable Maintenance and Modifications Department Procedure to clarify the requirements for an independent qualified review and technical review of work orders.																																															

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Sequoyah Nuclear Plant (SQN), Unit 1	05000327	YEAR	SEQUENTIAL NUMBER	REVISION	2 OF 7
		2010 --	001 --	00	

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

I. PLANT CONDITION(S)

SQN, Units 1 and 2 were operating at approximately 100 percent power at the time the spent fuel pool (SFP) [EISS code DA] back-up pump [EISS code P] common spare (C-S) breaker [EISS code BKR] was placed into service without arc chutes [EISS code CHT] and phase barriers.

II. DESCRIPTION OF EVENT

A. Event:

On April 4, 2010 at 1030 Eastern Daylight Time (EDT), Electrical Maintenance notified Operations personnel in the main control room (MCR) that the normal supply breaker for the SFP back-up pump C-S failed the inspection requirements of Technical Requirements Manual (TRM) 3.8.3.3. TRM Limiting Condition for Operation (LCO) 3.8.3.3 states that all circuit breakers actuated by fault currents that are used as isolation devices protecting 1E busses from nonqualified loads shall be operable. Action b states that with one or more of the above required circuit breakers inoperable either trip the inoperable circuit breaker(s), rack-out the circuit breaker(s) within 8 hours, and verify the circuit breaker(s) to be racked out once per 7 days. MCR operators entered TRM LCO 3.8.3.3, Action b for SQN, Units 1 and 2. At SQN, circuit breakers actuated by fault currents are used as isolation devices. The operability of these circuit breakers ensures that the 1E busses will be protected in the event of faults in nonqualified loads powered by the busses.

On April 5, 2010 at 0038 EDT, Electrical Maintenance completed the repairs on the SFP back-up pump C-S breaker. At 0100 EDT the SFP back-up pump C-S breaker was returned to service following repairs and successful testing. The MCR operators exited TRM 3.8.3.3, Action b. At 0130 EDT Operations placed the SFP back-up pump C-S in service. At 1145 EDT Electrical Maintenance notified the MCR operators that the SFP back-up pump C-S breaker was installed without arc chutes and phase barriers. As a result, the MCR operators entered TRM LCO 3.8.3.3, Action b, for the circuit breaker being inoperable and entered Technical Specification (TS) LCO 3.8.2.1, Action a, because the 480-volt Shutdown Board 2A1-A, for SQN, Units 1 and 2 was considered inoperable. TS LCO 3.8.2.1 states that the following ac electrical boards (480-volt Shutdown Board 2A1-A is listed here) shall be operable and energized with tie breakers open between redundant boards. Action a states that with less than the above complement of ac boards operable and energized, restore the inoperable boards to operable status within 8 hours or be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours. The shutdown board was considered inoperable because of the unknown affects of the breaker being installed without the arc chutes or the phase barriers on the shutdown board. If the breaker had actuated as

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Sequoyah Nuclear Plant (SQN), Unit 1	05000327	YEAR	SEQUENTIAL NUMBER	REVISION	3 OF 7
		2010 --	001	-- 00	

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

designed, without the arc chutes and phase barriers installed, it could have an adverse affect on the shutdown board.

At the time of discovery, SQN, Units 1 and 2 had exceeded the TS LCO action time of 8 hours specified in TS LCO 3.8.2.1, Action a. This event is reportable in accordance with 10 CFR 50.73 (a)(2)(i)(B) as an event in which SQN, Units 1 and 2 were operated in a condition prohibited by TSs.

- B. Inoperable Structures, Components, or Systems that Contributed to the Event:
None.
- C. Dates and Approximate Times of Major Occurrences:

Date	Description
April 2, 2010	A work order was initiated to test the SFP back-up pump C-S circuit breaker. The activity was planned and merged with the weekend schedule.
April 3, 2010	The work order was reviewed by Electrical Maintenance for task performance. The Electrical Maintenance technician identified that steps required to complete the scope of work were missing, but failed to make the required notifications to have the work order corrected.
April 3, 2010	The breaker was removed and transported to the breaker shop for testing.
April 4, 2010 at 1030 EDT	The MCR operators were notified that the breaker for the SFP back-up pump failed the direct trip actuator test. Operation's personnel entered TRM LCO 3.8.3.3, Action b, for SQN, Units 1 and 2 because the breaker was inoperable.
April 5, 2010 at 0038 EDT	Electrical Maintenance completed repairs on breaker. Maintenance personnel placed the breaker in the cubicle in Shutdown Board 2A1-A.
April 5, 2010 at 0100 EDT	Operators racked in the breaker for the SFP back-up pump C-S. The breaker met its post maintenance testing requirements and acceptance criteria. Operation's personnel exited TRM 3.8.3.3, Action b, for SQN, Units 1 and 2.
April 5, 2010 at 1145 EDT	Electrical Maintenance personnel notified the MCR operators that the SFP back-up pump C-S breaker was

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Sequoyah Nuclear Plant (SQN), Unit 1	05000327	YEAR	SEQUENTIAL NUMBER	REVISION	4 OF 7
		2010 --	001 --	00	

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

installed without arc chutes and phase barriers. Operation's personnel entered TRM LCO 3.8.3.3, Action b, for SQN, Units 1 and 2 because the breaker was inoperable. Also, the operators entered TS LCO 3.8.2.1, Action a, because the 480-volt Shutdown Board 2A1-A was potentially inoperable for SQN, Units 1 and 2.

April 5, 2010 at
1700 EDT

A pre-job brief was held to perform a one-time only procedure change to open the transfer switch under load.

April 5, 2010 at
1800 EDT

SFP back-up pump C-S breaker was disconnected and racked out. MCR operators exited TS LCO 3.8.2.1, Action a, for SQN, Units 1 and 2.

D. Other Systems or Secondary Functions Affected:

Because the breaker for the SFP back-up pump was inoperable as a result of the missing arc chutes and phase barriers, Shutdown Board 2A1-A was considered inoperable.

E. Method of Discovery:

An Electrical Maintenance technician discovered arc chutes in the Electrical Maintenance shop and notified management. It was determined that the arc chutes and phase barriers had not been installed on the SFP back-up pump C-S breaker. Electrical Maintenance notified the MCR operators that the SFP back-up pump C-S breaker was installed without arc chutes and phase barriers.

F. Operator Actions:

Following Electrical Maintenance's notification that the SFP back-up pump C-S breaker had been installed without the required arc chutes and phase barriers, Operation's personnel entered TRM LCO 3.8.3.3, Action b, for the circuit breaker being inoperable and entered TS LCO 3.8.2.1, Action a, because of the resulting inoperability of the 480-volt Shutdown Board 2A1-A.

G. Safety System Responses:

No safety system response was required.

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Sequoyah Nuclear Plant (SQN), Unit 1	05000327	YEAR	SEQUENTIAL NUMBER	REVISION	5 OF 7
		2010 --	001 --	00	

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

III. CAUSE OF THE EVENT

A. Direct Cause:

The immediate cause was Electrical Maintenance personnel failed to install the SFP back-up pump C-S breaker arc chutes and phase barriers.

B. Root Cause:

The root cause of the event was determined to be that a less than adequate process exists for conducting technical reviews. At SQN, technical reviews are independent reviews of work order instructions. The steps required to return the breaker to an operable state were omitted from the work order and were not noted during the technical review of the work order.

C. Contributing Factor:

The significant contributing cause of the event was the failure of the Electrical Maintenance technician to stop work when the work order was identified as being inadequate for the task to be performed.

IV. ANALYSIS OF THE EVENT

On April 5, 2010 at 1145 EDT, Electrical Maintenance notified MCR operators that the SFP back-up pump C-S breaker was installed without arc chutes and phase barriers. As a result, MCR operators entered TRM LCO 3.8.3.3, Action b, for the circuit breaker being inoperable and entered TS LCO 3.8.2.1, Action a, because of the inoperability of the 480-volt Shutdown Board 2A1-A, for SQN, Units 1 and 2. At the time of discovery, SQN, Units 1 and 2 had exceeded the TS LCO action time of 8 hours specified in TS LCO 3.8.2.1, Action a.

The shutdown board was considered inoperable because of the unknown affects of the breaker being installed without the arc chutes or the phase barriers on the shutdown board. If the breaker had actuated as designed, without the arc chutes and phase barriers installed, it could have an adverse affect on the shutdown board. However, opening of the SFP back-up pump C-S breaker did not affect its ability to function as required nor did it affect the shutdown board or other components.

The safety consequences of the event involve assessment of the potential effects of the SFP back-up pump C-S breaker tripping when called upon to protect the 480 volt Shutdown Board 2A1-A. In the event the breaker caused damage to the shutdown board, the feeder breaker to the shutdown board would open, limiting the loss of electrical

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Sequoyah Nuclear Plant (SQN), Unit 1	05000327	YEAR	SEQUENTIAL NUMBER	REVISION	6 OF 7
		2010 --	001 --	00	

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

equipment to the shutdown board. During the period of time the 480 volt Shutdown Board 2A1-A was inoperable, calibration activities on the A Common Station Service Transformer resulted in an offsite power source being inoperable but available for a short time. Based on a review of Operator logs, no other components associated with the other shutdown boards were out of service. For transients in which offsite power is a limiting consideration, the SQN UFSAR accident analysis assumptions include loss of all offsite power with an initiating event. These transients also assume a single failure of one diesel generator. Since both diesel generators were operable during the time the 2A1-A 480v Shutdown Board was inoperable, SQN remained within the assumptions of the UFSAR.

V. ASSESSMENT OF SAFETY CONSEQUENCES

Based on the above "Analysis of The Event," this event did not adversely affect the health and safety of plant personnel or the general public.

VI. CORRECTIVE ACTIONS

A. Immediate Corrective Actions:

Corrective actions included Operations transferring loads from the 480-volt Shutdown Board 2A1-A and opening the feeder circuit breaker to allow the SFP back-up pump C-S breaker to be removed from service in order to exit TS LCO 3.8.2.1, Action a.

All Electrical Maintenance work was suspended, Electrical Maintenance personnel were briefed on the event and lessons learned, and the Maintenance Manager ordered a directive to all Maintenance personnel that all emergent work and work associated with TS systems, structures, or components performed less frequently than quarterly, that is performed on the off shifts, will have maintenance supervisor oversight. In addition, the Electrical Maintenance technician will receive appropriate disciplinary actions.

B. Corrective Actions to Prevent Recurrence:

The corrective actions are being managed through the Tennessee Valley Authority and the SQN Corrective Action Program.

Maintenance & Modifications Department Procedure-1, Maintenance Management System, will be revised to clarify the requirements for an independent qualified review and technical review of work orders and include a detailed independent qualified review and technical review checklist for use with work orders.

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Sequoyah Nuclear Plant (SQN), Unit 1	05000327	YEAR	SEQUENTIAL NUMBER	REVISION	7 OF 7
		2010 --	001 --	00	

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

VII. ADDITIONAL INFORMATION

A. Failed Components:

None.

B. Previous LERs on Similar Events:

A review of previous reportable events within the last three years did not identify any previous similar events.

C. Additional Information:

None.

D. Safety System Functional Failure:

This event did not result in a safety system functional failure in accordance with 10 CFR 50.73(a)(2)(v).

E. Unplanned Scram with Complications:

This condition did not result in an unplanned scram with complications.

VIII. COMMITMENTS

None.