APPENDIX A

NOTICE OF DEVIATION

Tennessee Valley Authority Sequoyah License Nos. CPPR-72 CPPR-73

Based on the results of the NRC inspection conducted on October 2-5, 1979, certain of your activities appear to deviate from your commitments to the Commission and have safety significance as indicated below:

A. Sections C.4, C.5 and C.7 of the Fire Protection Program Review (FPPR) dated January 20, 1977 and March 9, 1979 Revision state that the installation of the fire protection systems will be accomplished by construction documents with installation verified by independent inspections and tests conducted in accordance with written procedures and that adequate records will be maintained to document that the systems conform to the prescribed criteria. Sections E.1 and E.3 of the FPPR state that the fire alarm and fire suppression systems will meet the applicable National Fire Protection Association (NFPA) codes and standards.

Contrary to the above, documentation is not provided on all of the inspections and tests conducted on the fire protection systems, including hydrostatic pressure and flushing tests conducted on fire protection piping systems and functional tests conducted on fire detection systems. These inspections and tests are required by the applicable NFPA Standards and Codes and are also specified in the construction documents.

B. Sections F.1.B and F.1.F of the FPPR state that a noncombustible housing will be provided for each reactor coolant pump. The housing was to enclose the pump to contain a three (3) dimensional combustible liquid discharge and to act as a heat collector to reduce the response time of the automatic fire suppression system.

Contrary to the above, in lieu of a noncombustible housing for each pump, a metal catch basin has been provided beneath each reactor coolant pump and a metal canopy has been provided over each pump. Also, portions of the automatic fire suppression system is not located beneath the canopy as stipulated to reduce the response time of the system.

C. Sections E.3(c), F.1.E, F.1.F, F.1.G and F.2.F of the FPPR state that the water fire suppression systems will be designed and installed to meet the provisions of NFPA-13, Sprinkler Systems, and NFPA-15, Water Spray Fixed Systems.

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Contrary to the above, the sprinkler systems which were inspected do not meet the following provisions of NFPA-13 or NFPA-15:

- The pre-action sprinkler system piping is not supervised as required by Section 5-3.5.2 of NFPA-13.
- The systems are not provided with adequately sized "test pipes" (main drains) arranged to permit full flow tests to assure that the water supply piping and connections are in order as required by Section 2-9 of NFPA-13.
- The activation circuits from the fire detection systems to the deluge/pre-action valves are not electrically supervised as required by Section 5-3.5.2 of NFPA-13 and Section 8-5 of NFPA-15.
- 4. The control valves to the alarm and water flow devices are not of the type which can be sealed or locked in the correct position as required by Section 3-17.4.5 of NFPA-13.

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