

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah 1

Docket Nos. 50-327
License No. DPR-77

As a result of the inspection conducted on May 19-22, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations are identified.

- A. 10 CFR 50, Appendix B, Criterion V, and Section 17.2.5 of the accepted QA program require that procedures and instructions prescribing operational activities that affect safety-related functions provide applicable quantitative and qualitative acceptance criteria. Section 4.5 of Part II of the Operational Quality Assurance Manual requires that acceptance criteria shall be included in the surveillance instruction, and test or inspection data shall be compared with these criteria as a basis for acceptance or rejection.

Contrary to the above, instructions prescribing operational activities that affect safety-related functions did not provide applicable quantitative and qualitative acceptance criteria in that surveillance instruction SI-2 did not include quantitative and qualitative acceptance criteria. Consequently, pressurizer level channel LI-68-339A was inoperable on April 2, 1981, but was not placed into trip, as required by Technical Specification 3.3.1.1, until the inoperable condition was identified by an NRC inspector.

This is a Severity Level IV Violation (Supplement I.F).

- B. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with instructions. Section 17.2.3 of the accepted QA program requires that instructions shall be implemented to assure that modifications meet quality assurance standards at least equal to those of the original installation. The safety evaluation for Work Plan 9117 which recalibrated pressurizer level channel LT-68-339 included special requirement 2 which required that the level indication of channel 68-339 to be compared once per shift to the other two level channels (335 & 320) to confirm that the relationship was unchanged.

Contrary to the above, the safety evaluation was inadequate in that it assumed without confirmation that adequate, quantified surveillance instructions existed when in fact they did not.

This is a Severity Level IV Violation (Supplement I.F).

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Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown. Under the authority of Section 162 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: JUL 9 1981