

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

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December 29, 1982

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/82-25 AND 50-328/82-24

The subject OIE inspection report dated November 30, 1982 from R. C. Lewis
to H. G. Parris cited TVA with one Severity Level IV violation.

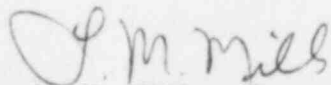
Enclosed is our response to the subject inspection report.

If you have any questions, please get in touch with R. H. Shell at
FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Licensing

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.
50-327/82-25 AND 50-328/82-24
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED NOVEMBER 30, 1982

Item 50-327/82-25-01

Technical Specification 3.6.1.8 requires that two independent Emergency Gas Treatment System (EGTS) cleanup subsystems shall be operable in modes 1, 2, 3 and 4.

Contrary to the above, two EGTS cleanup subsystems were not maintained operable in that on September 11, 1982 the Unit 1 elevation 690 annulus door was left open and obstructed by test equipment when the Unit was in mode 3 (450°F). With the annulus door open the EGTS would not have been able to maintain the required negative pressure in the annulus for operability. The licensee identified the violation and took immediate action to close the annulus door and return the EGTS to an operable status.

This is a Severity Level IV Violation (Supplement I.D.2). This violation applies to Unit 1 only.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Offsite test personnel had come onsite to test penetrations as required by Surveillance Instruction (SI) 157, Testable Penetrations.

On September 11, 1982, the shift engineer was notified that the test group would be performing SI-157 which involves annulus entry. The test group proceeded to the annulus access area and security personnel unlocked the annulus door for them. The annulus door (A65) was opened with relative ease by an individual in the test group. Door A65 was left open for access of personnel and a test line ran to the annulus. Door A64 (an access door into the penetration room where the annulus door is located) was also left open.

The interlocks on doors A65 and A64 were inoperable allowing both doors to be opened at the same time. The test personnel were not aware that opening both doors would cause the EGTS to be inoperable. There were no signs on doors A64 and A65 to indicate that if A65 is open A64

should be closed and vice versa. The SI-157 required shift engineer notification and signature but did not contain precautions regarding the significance of the doors.

A contributing factor to A65 being left open was the fact that the test personnel opened the door with relative ease. This was due to the fact that an annulus purge was in progress and the normal pressure differential causing the A65 door to be difficult to open did not exist. When the door was closed, the vacuum was returned because purging operations had stopped.

An analysis was performed to evaluate the consequences of a loss-of-coolant accident with the EGTS inoperable as described above. The analysis was performed using conservative assumptions. The results of this analysis indicated that for worst case conditions, the 10 CFR 100 limits would not be reached.

3. Corrective Steps Which Have Been Taken and the Results Achieved

At 2200 hours on September 11, 1982, the shift engineer was notified by telephone that the annulus door was open. The shift engineer took action to verify this and an assistant unit operator was sent down to shut and secure the door. This area at the time was a dressout area. Door A65 was eventually closed and secured at 2320 hours.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

Investigation revealed that the interlocks on doors A65 and A64 may not be strong enough for normal use. An evaluation is underway to either modify or replace the interlocks. Also, interlocks on other doors required to maintain auxiliary building or EGTS operability will be evaluated. A preventive maintenance program (PM 756-410) has been established on these interlocks. Administrative controls in the form of signs have been posted on these vital doors to prevent inadvertent opening if the interlocks fail. SI-157 has been revised to include the significance of the annulus doors with regard to EGTS operability.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved at 2320 on September 11, 1982, when door A65 was closed and secured.