

TENNESSEE VALLEY AUTHORITY

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Chattanooga, Tennessee 37402-2801

October 1, 1990

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

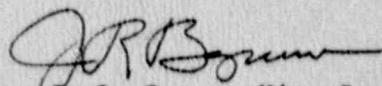
Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 1 - DOCKET
NO. 50-327 - FACILITY OPERATING LICENSE DPR-77 - LICENSEE EVENT REPORT (LER)
50-327/90018

The enclosed LER provides details of an event where required surveillance inspections on fire dampers located in four fire doors were not performed within the required time interval. This event is being reported in accordance with 10 CFR 50.73(a)(2)(i) as an operation prohibited by technical specifications.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



J. R. Bynum, Vice President
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Enclosure
cc (Enclosure):

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Expires 4/30/92

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Sequoia Nuclear Plant, Unit 1	DOCKET NUMBER (2) 0500032710F03	PAGE (3) 03
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TITLE (4) Required surveillance inspection not performed on four fire door dampers as a result of an inadequate procedure

EVENT DAY (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)	
08	31	90	018			08	31	90	Sequoia, Unit 2	05000328	

OPERATING MODE (9) | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following)(11)

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Geof Hipp, Compliance Licensing	615843-7766

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On August 31, 1990, with Units 1 and 2 in Mode 1, it was discovered that surveillance inspections on four fire dampers located in fire doors in the auxiliary building had not been performed within the required time interval. Although the subject fire doors are included in the appropriate surveillance instruction (SI), no acceptance criteria are given for the fire dampers. Therefore, there is no record of the fire dampers having been inspected. The root cause of this event has been attributed to an inadequate procedure. Upon discovery of the problem, Limiting Condition for Operation (LCO) 4.0.3 was entered. A work request was prepared and completed the same day for inspection of each of the fire dampers. All four fire dampers were verified to be functional, and LCO 4.0.3 was exited. This problem was verified to be limited to only the four subject dampers. The SI will be revised to include acceptance criteria for the fire dampers prior to the next scheduled performance, but no later than December 1, 1991.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1) Sequoyah Nuclear Plant Unit 1	DOCKET NUMBER (2) 0500032790	LER NUMBER (6)			PAGE (3)		
		SEQUENTIAL	REVISION				
		YEAR	NUMBER	NUMBER			
		0	1	8	0	0	2 OF 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Description of Event

At 0830 Eastern daylight time (EDT) on August 31, 1990, with Unit 1 in Mode 1 (100 percent power, 2,235 pounds per square inch gauge [psig], 578 degrees Fahrenheit [F]) and Unit 2 in Mode 1 (69 percent power, 2,235 psig, 568 degrees F), it was discovered that surveillance inspections on four fire dampers (EIIS Code DMP) located in fire doors (EIIS Code DR) had not been performed within the required time interval. The condition was discovered during the 1990 fire protection audit performed by Quality Assurance. The fire dampers allow ventilation to be supplied to the rooms served by the fire doors. The four fire doors and associated rooms are located in the auxiliary building (EIIS Code NF) at the following locations:

<u>Door #</u>	<u>Elevation</u>	<u>Room Designation</u>
A37	669	Waste evaporator package room
A38	669	Auxiliary waste evaporator package room
A63	690	Unit 1 volume control tank room
A76	690	Unit 2 volume control tank room

The location of these rooms are shown on the Updated Final Safety Analysis Report, Figures 1.2.3-5 and 1.2.3-6.

Surveillance Requirement (SR) 4.7.12 requires the fire dampers to be inspected every 18 months or after repair or maintenance to demonstrate that they are functional. Although the subject fire doors are included in Surveillance Instruction (SI) O-SI-FIN-410-001.0, "Visual Inspection of Technical Specification Fire Doors on a Periodic Basis," no acceptance criteria are given for the fire dampers. Therefore, there is no record of the fire dampers having been inspected.

Upon discovery of the problem on August 31, 1990, Limiting Condition for Operation (LCO) 4.0.3 was entered. A work request (WR) was prepared and completed the same day for inspection of each of the fire dampers. All four fire dampers were verified to be functional, and LCO 4.0.3 was exited at 2107 EDT.

Cause of Event

The root cause of this event has been attributed to an inadequate procedure in that O-SI-FIN-410-001.0 failed to specify any acceptance criteria for the fire dampers to satisfy when the fire doors are inspected. Other fire doors have been reviewed for a similar situation. No other doors with dampers were identified; therefore, it is considered that this procedural omission was an isolated occurrence.

Analysis of Event

This event is being reported in accordance with 10 CFR 50.73(a)(2)(i) as an operation prohibited by technical specifications in that a SR was not performed in the required time interval.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Sequoyah Nuclear Plant Unit 1	050032790	0	18	0	0	0	303

TEXT (If more space is required, use additional NRC Form 366A's) (17)

The fire doors and passive fire barriers at SQN must be breached to allow for air passage for cooling and heating. The breach is provided with either a fire rated damper, door, or seal. The doors and fire dampers are described on Drawing Series 46W454, which describes the architectural door and hardware schedule. The fire dampers used in the subject doors are listed on Drawing 46W454-6. The drawings were used in the development of the fire door inspection procedure, however, acceptance criteria for the fire dampers were inadvertently omitted from the SI.

The fire dampers were verified to be functional on the same day the event was discovered. It is probable that the fire dampers had always been functional even though the performance of the SI did not document that fact. Furthermore, the affected areas were in the routes of hourly, roving fire watch patrols. Therefore, it can be concluded that there was no adverse effect on the health and safety of the general public or plant personnel as a result of this event.

Corrective Action

The immediate corrective action taken upon discovery was to ensure that the hourly, roving fire watch patrol was in place, making rounds, and observing the subject area. The four fire dampers were verified to be functional the same day as discovered under a WR that inspected the fire dampers and doors. Additionally, Surveillance Instruction O-SI-FIN-410-001.0 will be revised to include acceptance criteria for the fire dampers prior to the next scheduled performance, but no later than December 1, 1991.

Additional Information

A review of LERs has revealed several instances where an SI performance time interval was exceeded. However, the event described in this report, omission of fire dampers surveillance from procedures, has not been previously reported.

Commitment

Surveillance Instruction O-SI-FIN-410.001.0 will be revised to include acceptance criteria for the fire dampers prior to the next scheduled performance, but no later than December 1, 1991.

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