Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

J. L. Wilson
Vice President, Sequoyah Nuclear Plant

February 26, 1992

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) 50-327/92003

The enclosed LER provides details concerning a failure to verify the valve position for fire protection valves inside the units' containments as required by Technical Specification (TS) Surveillance Requirement 4.7.11.2.a. This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation prohibited by TSs.

Sincerely,

J. L. Wilson

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Enclosure
cc: See page 2

IE22
1/1

cc (Enclosure):
INPO Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

Mr. D. E. LaBarge, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

NRC Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy-Daisy, Tennessee 37379

Mr. B. A. Wilson, Project Chief
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

NRC Form 366 (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

Approved OMB No. 3150-0104
Expires 4/30/92

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
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TITLE (4)

Fire suppression valve positions inside containment not verified because of a deficient procedure.

EVENT DAY (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
									Sequoyah, Unit 2	0 5 0 0 0 3 2 8
0 1 2 7	9 2	9 2	9 2	0 0 3	0 0	0 2	2 6	9 2		0 5 0 0 0

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following)(11)				
	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)	
POWER LEVEL (10) 1 0 0	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)	
	20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in	
	20.405(a)(1)(iii)	XX 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	Abstract below and in	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	Text, NRC Form 366A)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (AREA CODE)
Melissa Meade, Compliance Engineer	6 1 5 8 4 3 - 7 7 6 6

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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On January 27, 1992, Sequoyah (SQN) determined that Surveillance Requirement (SR) 4.7.11.2.a was not satisfied for fire suppression system valves inside containment with the unit at power. A review of the surveillance procedure's revision history indicated that this condition has existed since the initial issue of the procedure. The root cause of this event appears to be that the intent of the SR was considered to be fulfilled without verifying the position of the valves in containment while the unit was operating because of accessibility considerations. The valves were required to be locked or sealed in the open position throughout this timeframe. The surveillance instruction (SI) implementing the SR was revised on January 28, 1992, and performed on January 29, 1992. The valves were found in the correct position.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

I. Plant Conditions

Units 1 and 2 were in power operation at approximately 100 percent and 96 percent reactor thermal power, respectively.

II. Description of Event

A. Event:

On January 27, 1992, SQN determined that Surveillance Requirement (SR) 4.7.11.2.a was not satisfied for fire suppression system valves inside containment. The procedure implementing the SR did not require verifying the position of suppression system valves inside containment with the unit at power, although the SR does not have a waiver for such conditions.

B. Inoperable Structures, Components, or Systems that Contributed to the Event:

None.

C. Dates and Times of Major Occurrences:

July 1979	A surveillance instruction (SI) was issued to implement SR 4.7.11.2.a containing the statement that the valves inside containment will not have to be checked on a 31-day frequency when locked in position.
1986	An SI review was performed to ensure that SRs were properly implemented. This review did not identify the waiver of the containment valve position verification.
October 1989	The SI was revised to contain a separate checklist for the valves in each unit's containment and to require performance of the containment valve checklists only when the unit is in Modes 4, 5, or 6.
November 27, 1991	The SI was enhanced in accordance with SQN's fire protection improvement program. The checklists for the containment valves were recombined with the other valves into a single checklist. The waiver to verify the containment valve positions while the units are operating was not removed.
January 24, 1992	An auxiliary unit operator (AUO) questioned the SI's compliance with the SR.
January 27, 1992	A problem event report was issued to document the confirmed discrepancy.

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

January 28, 1992 The SI implementing the SR was revised to include checking the position of these valves on a 31-day frequency.

January 29, 1992 The SI was performed for these valves and they were found in the correct position.

D. Other Systems or Secondary Functions Affected:

The subject valves supply automatic fire suppression capability for the reactor coolant pumps (RCPs).

E. Method of Discovery:

An AUO questioned the waiver to verify containment valve position while reviewing the procedure.

F. Operator Actions:

None.

G. Safety System Responses:

Not applicable - no safety system responses were required.

III. Cause of the Event

A. Immediate Cause:

The SI implementing the SR did not contain the appropriate requirements to ensure literal compliance with TSs was maintained.

B. Root Cause:

The root cause of this event appears to be that the individuals preparing, revising, and evaluating the procedure implementing the SR considered that the intent of the SR was fulfilled without verifying the position of the valves in containment during operation. Several similar TS SRs contain waivers for verifying valve positions in inaccessible areas or for valves that are locked or sealed. For example, the frequency of the SR to cycle suppression system valves is different for "testable" and "nontestable" valves and the SR to inspect hose stations does not require inspections of "inaccessible" hose stations at power; however, the SR for valve position verification does not contain such a waiver. Literal compliance with this SR was apparently not questioned.

C. Contributing Factors:

None.

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

IV. Analysis of the Event

Following discovery of the condition, the valves were verified to be in the correct position. These valves were required to be locked or sealed in the open position throughout this timeframe. Configuration control processes ensure that if a valve position is off-normal, it is returned to normal configuration following the evolution requiring the position change. Additionally, redundant fire protection capability is provided for the RCPs via hose stations. For these reasons, this event did not adversely effect the health and safety of the public.

V. Corrective Actions

A. Immediate Corrective Actions:

The SI implementing the SR was revised on January 28, 1992, to include checking the positions of these valves on a 31-day frequency. The SI was performed on January 7, 1992, and the valves were found in the correct position.

B. Corrective Actions to Prevent Recurrence:

1. Other SIs will be reviewed for provisions to waive requirements with the unit at power to ensure that compliance is maintained.

2. A TS change is being considered to allow waiving the verification of valve positions for containment valves that are locked, sealed, or otherwise secured based on the safety benefit versus dose expenditure.

VI. Additional Information

A. Failed Components:

None.

B. Previous Similar Events:

The SI review that was performed in 1986, as previously discussed, was intended to verify the technical adequacy of SIs. This review did not identify this condition based on the same interpretation previously discussed. Similarly, the fire protection improvement plan procedure review followed the "inaccessible" interpretation. Following the 1986 review, no previous events were reported involving an inadequate procedure because of an incorrect interpretation.

VII. Commitment

Other SIs will be reviewed for provisions to waive requirements with the unit at power to ensure compliance is maintained by August 10, 1992.