

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah, Units 1 and 2

Docket Nos. 50-327, 50-328
License Nos. DPR-77, DPR-79

During an NRC inspection conducted February 2, 1992 through February 29, 1992 violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

Technical Specification 6.8.1 requires that procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, be established, implemented and maintained. This includes procedures for operation and control of safety-related systems. The requirements of TS 6.8.1 are implemented, in part, by the following procedures:

- A. Surveillance Instruction 1-SI-OPS-000-002.0, Shift Log, Revision 4, page 20, requires, in part, that operators determine Reactor Coolant System (RCS) flow by recording flow instrument indication in the main control room and comparing the data to the requirements of Technical Instruction TI-28, Curve Book, Units 1 and 2, Revision 1, Attachment 5, Figure A.27.

Contrary to the above, on several occasions between January 18 and February 9, 1992 unit 1 operators did not compare the control room data to the acceptance criteria in TI-28, resulting in operation with flow data lower than the acceptance criteria.

This is a Severity Level IV violation (Supplement I).

- B. (1) Administrative Instruction (AI) 30, Conduct of Operations, Revision 36, paragraph 11.8, requires, in part, that before an operator performs an operation, the expected response should be anticipated.

Contrary to the above, on February 11, operators did not adequately consider the expected response to the shutting of reactor trip breakers as a part of a planned test; and, as a result, the breakers automatically tripped open due to the presence of a valid trip signal.

- (2) AI-30, paragraph 11.8.3, requires, in part, that when an unexpected annunciator is received during testing, testing may continue provided that the basis for continuing the evolution is logged in the operator journal and test log, and a procedure revision is initiated prior to the next performance.

Contrary to the above, on February 11, operators failed to make a log entry in the operator journal or test log, and failed to initiate a procedure change prior to the next performance after an unexpected annunciator was received during turbine trip testing.

The two examples of failure to follow the requirements of AI-30 are identified as a Severity Level IV violation (Supplement I).

- C. SSP-12.53, Annunciator Disablement, Revision 1, required, in part, that a safety evaluation pursuant to 10 CFR 50.59 be performed when a safety related annunciator is removed from service.

Contrary to the above, on December 30, 1991 the facility disabled the annunciator for the Unit 1 Narrow Range RTD Failure Loop 3 alarm without performing a safety evaluation prior to identification by NRC inspectors on February 13, 1992.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Sequoyah within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 11th day of March 1992