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J. L. Wilson Vice Prendent Brigsoya's Nacion Part

February 18, 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) 50-327/92001

The enclosed LER provides details concerning the failure to perform 4 technical specification (TS) surveillance requirement for diesel generator sequence timers within the specified time interval. This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation prohibited by TSs.

Sincerely,

Ism

L. Wilson

Enclosure cc: See page 2

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U.S. Nuclear Regulatory Commission Page 2 February 18, 1992

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

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NRC Form 366 (6-89)	U.S. NUCLEAR REGULATORY COMMISSION				Approved OMB No. 3157-0104 Expires 4/30/92		
	LICENS	EE EVENT REPORT (	LER)				
FACILITY NAME (1) Sequoyah Nuclear TITLE (4)	Plant, Unit 1				DOCKET NUMBE 101510101013	R (2)   PAG  2  7  1 00	(E. (3)   0 5
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16).

On January 17, 1992, at 0800, TVA determined that the 2B-B diesel generator load sequence timer associated with the B train electric board room air handling unit had not been calibrated within the frequency required by technical specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.d.10. On January 17, the timer was subsequently found to be within tolerance. On March 8, 1991, the timer surveillance instruction (SI) was revised to include calibration of these sequence timers. The revision was not reviewed by the periodic test coordinator as intended by the standard governing procedure revisions because this intent was not clearly conveyed; t. refore, the scheduling mechanism for ensuring that SRs are performed was bypassed. Additionally, work requests (WRs) written to calibrate the timers within frequency were not coordinated with the Periodic Test section. The site standard governing WRs was found to not require this coordination. Corrective action includes revising the site standards governing control of site procedures and WRs to adequately convey the intent of the periodic test coordinator's review of procedures, and to ensure the WRs satisfying SRs are coordinated with the Periodic Test section.

NRC Form 366A (6-89) U.S. NUCLEAR REGULATORY COMMISSION

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

## LICENSEE EVENT REPORT (LER)

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FACILITY	NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)      SEQUENTIAL    REVIS	PAGE (3)
Sequoyah Nuclear Plant Unit 1		  0 5 0 0 0 3  2  7	YEAR   NUMBER   NUMB 9 2 0 0 1 1 0 1	ER             0   012  0F  0 5
TEXT (1f	more space is required.	use additional NRC Form 366A's) (	17)	
Ι.	Plant Conditions			
	Units 1 and 2 were thermal power.	in power operation at app	roximately 100 percent r	eactor
-11.	Description of Even	nt		
	A. Event:			
	On January 17, load sequence of air handling un required by TS	1992. at 0800, TVA determ enabling timer associated nit had not been calibrate SR 4.8.1.1.2.d.10.	ined that the 2B-B diese with the B train electri d within the 18-month fr	1 generator c board room equency

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

None.

C. Dates and Times of Major Occurrences:

February 2, 1990 B train electric board room air handling unit sequence timer replaced and calibrated during a modification. The timer was not considered a TS device and was not placed in the surveillance program to ensure compliance with SR 4.8.1.1.2.d.10.

January 15, 1991 A condition adverse to quality report was initiated stating that the electric board room air handling unit sequence timers, among others, are TS required timers and should be in the surveillance program.

February 14, 1991 LER 50-327/91001 was issued to report this condition. Corrective action included adding this timer to the surveillance program.

March 8, 1991 The timer SI was revised to include calibrating the electric board room air handling units' sequence timers. The revision was not reviewed by the periodic test coordina'or as i 'ended by the standard governing procedure revisions. \*NRC Form 366A (6-89)

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2) LER NUMBER (6)   PAGE (3)					
Sequoyah Nuclear Plant Unit 1	VEA: NUMBER   NUMBER					
TEXT (If more space is required, use add	itional NRC Form 366A's) (17)					
March 12, 1991	Maintenance personnel realized that the calibration interval would be exceeded by waiting until the next regularly scheduled performance of the SI, during the Unit 2 Cycle 5 (U2C5) refueling outage, and initiated a (WR) to calibrate the timer. The WR said that: the timer was last calibrated on February 2, 1990, by a workplan. The SI to calibrate the timer is not scheduled until U2C5. The 18-month calibration interval is up on August 2, 1991. Calibrate the timer for electrical board room air handling unit B on or before August 2, 1991.					
August 22, 1991	During a schedule review, the WR to calibrate the timer was removed from the schedule, apparently because replacement timers were not verified to be available. The TS requirement was not recognized during this review.					
January 16, 1992	While conducting a review of open WRs, the need and urgency for this WR was questioned.					
January 17, 1992	Work Control and Maintenance personnel determined that the timer calibration was required by TSs and was beyond the TS required surveillance interval. The timer was then calibrated and found to be within tolerance.					
D. Other Systems or Se	condary Functions Affected:					
None.						
E Method of Discovery						

The need and urgency of the WR that was initiated to perform the required calibration was questioned while conducting a review of open WRs.

F. Operator Actions:

When informed of the condition, the operators removed the fuses from the control circuit to ensure that an air handling unit start would not overload the diesel.

G. Safety System Responses:

Not applicable - no safety system responses were required.

(6-89)

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## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
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Sequoyah Nuclear Plant Unit 1		YEAR NUMBER NUMBER	
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#### III. Cause of the Event

#### A. Immediate Cause:

The requirement to calibrate the timer before the surveillance interval expired was not tracked by the surveillance program. This program contains stringent scheduling controls for TS required surveillances.

## B. Root Cause:

The root cause of this event is a weakness in the site standard governing WRs. There are no requirements for the initiator of a WR intended to watisfy TS surveillances to ensure that these WRs are registered in the surveillance program so that they are appropriately tracked.

## C. Contributing Factors:

A contributing cause to this event is considered to be that the requirements contained in the standard governing control of site procedures relative to reviews of revisions by the Periodic Test coordinator are weak. The intent of the review by the Periodic Test coordinator is to ensure that the surveillance program scheduling is adequately maintained and updated; however, requirements in the standard do not adequately convey this intent. Had the Periodic Test coordinator reviewed the revision, a schedule date for the new equipment being added would have been generated.

### IV. Analysis of the Event

The timer was found to be within tolerance when calibrated; therefore, if called upon, it would have performed its intended function and the diesel generator would not have been overloaded. Therefore, this event did not have an adverse effect on the health and safety of the public.

## V. Corrective Actions

A. Immediate Corrective Actions:

The operators removed the fuses from the timer circuit. The sequence timer was calibrated, found to be within tolerance, and returned to service.

- B. Corrective Actions to Prevent Recurrence:
  - The site standard governing WRs will be revised to require the initiator of WRs generated to satisfy SRs to coordinate with the Periodic Test section.

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U.S. NUCLEAR REGULATORY COMMISSION

# LICENSEE EVENT REPORT (LER)

Sequoyah Nuclear Plant Unit 1 YEAR NUMBER	FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
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TEXT (If more space is required, use additional NRC form 366A's) (17)

- The site standard governing control of procedures will be revised to convey the intent of the periodic test coordinator's review of procedures.
- Weaknesses in the WR database that have been identified are being evaluated and corrected.
- A review of WRs will be conducted to ensure that TS required actions are not tracked solely by this system.
- VI. Additional Infor ation
  - A. Failed Components:

None

B. Previous Similar Events:

As described in the description of event, a previous event involving this sequence timer was reported in LER 50-327/91001. Corrective actions resulting from the 1991 event were expected to prevent recurrence.

LFRs 50-327/90007 and 50-327/90029 reported failing to perform SRs involving scheduling problems. 50-327/90007 concerned performance of a surveillance on one train and omitting the other; 50-327/90029 concerned a failure to properly ensure continued performance of an SI following shift change. Corrective actions for these events could not be expected to have precluded this occurrence.

## VII. Commitments

- The site standard governing WRs will be revised by May 8, 1992, to require the initiator of WRs generated to satisfy SRs to coordinate with the Periodic Test section.
- The site standard governing control of procedures will be revised by April 8, 1992, to adequately convey the intent of the Periodic Test coordinator's review of procedures.
- A review of WRs will be conducted by February 21, 1992, to ensure that TS required acitons are not tracked solely by this system.