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Due to an incomplete modification, radiation monitor O-RE-90-225 would not provide automatic isolation of direct releases from the neutralization tank. Two batch releases were made from the tank without compliance with action statement 30 of LCO 3.3.3.9.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104

EXPIRES 6/31/85

DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)		
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Effluent release paths from the high crud tank, non-reclaimable waste tank, and the neutralization tank are monitored by radiation monitor 0-RE-90-225. The monitor is required to provide automatic isolation of the release path if radiation levels exceed the monitor setpoint. If the monitor is inoperable, technical specification 3.3.3.9 action statement 30 requires (1) at least two independent samples to be analyzed, and (2) at least two technically qualified members of the facility staff independently verify the release rate calculations and discharge line valving.

Due to an incomplete modification, O-RE-90-225 would not provide automatic isolation of a direct release from the neutralization tank. The monitor would provide automatic isolation for release paths from the high crud and non-reclaimable waste tanks. For the purpose of a release from the neutralization tank, radiation monitor O-RE-90-225 should have been declared inoperable and action statement 30 of LCO 3.3.3.9 complied with.

A review of Surveillance Instruction (SI) -400.2, "Condensate Demineralizer Waste Effluent to the Turbine Building Sump - Periodic Continuous Releases", on 06/27/84 discovered that two releases from the neutralization tank had been made without complying with action statement 30 of LCO 3.3.3.9. One release was made on 06/24/84 and the other on 06/25/84. The monitor was only inoperable due to the fact it would not automatically isolate the release path, but 0-RE-90-225 was still monitoring the release and had a high radiation alarm been present, the release would have been manually terminated. All releases from the neutralization tank are batch releases. The tank is sampled, the sample is analyzed, the monitor setpoint set, and the tank is released with no additional effluent added to the tank during the release. Therefore, no unmonitored release was made from the tank.

The cause of the events has been attributed to procedure deficiency. SI-400.2 is used for all releases from the three tanks on a given day. The procedure only requires verification of the monitor operability for the first release each day and not before each release. Since the first release on each of the two days was from the high crud tank, the monitor was entered in the procedure as being operable.

All direct releases from the neutralization tank have been suspended until the modification has been completed which will provide automatic isolation for releases from the neutralization tank. SI-4CO.2 is being revised to verify operability of the monitor prior to each release.

At the times of the two releases, both unit 1 and unit 2 were in mode 1 (2235 psig, 578 degrees F) at 100% reactor power. There was no effect upon public health or safety. There have been no previous occurrences.

TENNESSEE VALLEY AUTHORITY Sequoyah Nuclear Plant Post Office Box 2000 Soddy Daisy, Tennessee 37379

July 26, 1984

U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 1 - DOCKET NO. 50-327 - FACILITY OPERATING LICENSE DPR-77 - REPORTABLE OCCURRENCE REPORT SQR0-50-327/84042

The enclosed licensee event report provides details concerning failure to comply with a technical specification action statement. This event is reported in accordance with 10 CFR 50.73, paragraph a.2.1.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

P.R. Willan

P. R. Wallace Plant Manager

Enclosure cc (Enclosure):

> James P. O'Reilly, Director U.S. Nuclear Regulatory Commission Suite 2900 101 Marietta Street, NW Atlanta, Georgia 30323

Records Center Institute of Nuclear Power Operations Suite 1500 1100 Circle 75 Parkway Atlanta, Georgia 30339

NRC Inspector, NUC PR, Sequoyah