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LIGENGEL EVENT REPORT (LER) TEXT CONTINUT	UATION
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U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)						PAGE (3)		
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Both SI-632.3 (Auxiliary Building Residual Heat Removal System External Leakage) and SI-267.74.2 (Inservice Pressure Testing of Residual Heat Removal System Outside Containment) perform inspection for leakage from the RHR system outside containment. SI-632.3 meets the requirement of NUREG 0578 to have an inspection program for leakage of systems which process primary coolant outside containment. SI-267.74.2 meets the ASME section XI requirement to perform an inservice system pressure test on class II and III pressure-retaining components outside containment. SI-632.3 is performed annually and SI-267.74.2 is required to be performed three times in ten (10) years. Both procedures allow credit to be taken for SI-632.3 in that it references numerous steps of SI-632.3. Simply, both instructions require valve lineups be performed followed by starting of the RHR pump. A four-hour hold time is required prior to the inspection being performed. The only difference in the valve lineups required by the procedures was that SI-267.74.2 required HCV-74-34 (RHR to RWST recirc line isolation valve) to be opened, and SI-632.3 did not.

On 07/10/84 at 0223 CST with unit 2 in mode 1 at 100% reactor power, the 2A-A RHR pump was started in preparation for SI-267.74.2 and SI-632.3. Subsequent QA verification discovered that the required valve lineup was not complete in that HCV-74-530 and HCV-74-34 had not been opened as required by procedure. At approximately 0858 CST, valves 74-530 and 74-34 were opened, and the four-hour hold time was restarted. At approximately 1145 CST, the test was terminated due to CVCS valve 62-83 leaking back through 74-530. At that time, HCV-74-530 and HCV-74-34 were closed.

Review of the system determined the test could be accomplished by keeping 74-530 closed and opening 62-83, and a procedure change was issued. When personnel initiated performance of the test on 07/11/84, they were informed by the unit operator that opening HCV-74-34 would result in both trains of RHR being inoperable. Additional review of the RHR system determined that the leakage inspection could be satisfied with the RWST head pressure on the RHR-RWST recirc line and HCV-74-34 need not be opened. A procedure change was issued to delete the requirement to open HCV-74-34, and the inspection was satisfactorily completed on 07/11/84.

For the event of 07/10/84, unit 2 did operate in a condition prohibited by technical specifications for two hours, forty seven minutes, but technical specifications were not violated due to HCV-74-34 being closed within the seven-hour action time of LCO 3.0.3.

All similar instructions pertaining to section XI external leakage inspections are being reviewed to ensure additional improper valve lineups are not being required.

There was no effect on public health or safety. There have been no previous occurrences.

TENNESSEE VALLEY AUTHORITY

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

August 8, 1984

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

Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 2 - DOCKET NO. 50-328 - FACILITY OPERATING LICENSE DPR-79 - REPORTABLE OCCURRENCE REPORT SQR0-50-328/84012

The enclosed licensee event report provides details concerning both trains of the residual heat removal (RHR) system being inoperable. This event is reported in accordance with 10 CFR 50.73, paragraph a.2.i, a.2.v, and a.2.vii.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

P.R I. Jela

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

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