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J. L. Wilson
Vice President, Sequoyah Nuclear Plant

April 10, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)	Docket Nos. 50-327
Tennessee Valley Authority)	50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327, 328/92-03 - RESPONSE TO NOTICES OF VIOLATION (NOVs) 50-327, 328/92-03-01, -03, AND -05

Enclosed is TVA's response to Bruce A. Wilson's letter to M. O. Medford dated March 11, 1992, which transmitted the subject NOVs. The NOVs identified three violations in the Operations functional area in which personnel failed to follow procedures for the conduct of operations, for logging of plant parameters, and for ensuring that a safety evaluation was performed in a timely manner for the removal of a safety-related annunciator from service.

Management's concerns and expectations regarding these issues and the need for rigorous procedural compliance have been communicated to Operations personnel. Operations personnel are aware that procedures must be followed meticulously in the performance of work activities. In addition, this inspection report has been reviewed with Operations personnel and the ramifications of failing to follow procedures have been discussed.

Enclosure 1 provides TVA's response to the NOVs. A summary statement of commitments contained in this submittal are provided in Enclosure 2.

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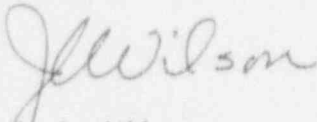
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U.S. Nuclear Regulatory Commission
Page 2
April 10, 1992

If you have any questions concerning this submittal, please telephone
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Sincerely,



J. L. Wilson

Enclosures

cc (Enclosures):

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ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327/92-03 AND 50-328/92-03
BRUCE A. WILSON'S LETTER TO M. O. MEDFORD
DATED MARCH 11, 1992

Violation 50-327, 328/92-03-01

"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:

" 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)."

Reason for the Violation

Unit operators in the performance of the main control room (MCR) shift log surveillance instruction (SI) routinely did not refer to the reactor coolant system (RCS) flow acceptance criteria contained in Technical Instruction (TI) 28, "Curve Book."

The operators believed that they knew and were familiar enough with the acceptance criteria and that it would not change without a technical specification (TS) revision; therefore, they did not consider that it was necessary to refer to the TI for performance of the MCR shift log SI each shift. However, the TI acceptance criteria was revised on January 18, 1992, to reflect the new flow limit that had been determined by the RCS flow verification SI.

Additional details concerning this event were reported in Licensee Event Report (LER) 50-327/92006 dated March 10, 1992.

Corrective Steps That Have Been Taken and Results Achieved

Revisions to the Units 1 and 2 MCR shift log SIs were made to place the RCS flow acceptance criteria directly on the SI data sheet. The revision also provided guidance for the operator to request performance of a conditional RCS flow verification SI from the reactor protection racks if the control board gauges indicated that the TS flow limit was not met.

Each shift operations supervisor (SOS) has discussed this event with his crew reinforcing the expectation that operators will meticulously follow procedures in the performance of work activities. If problems are identified during any activity, they are to be documented and appropriately corrected in a timely manner.

Corrective Steps That Will be Taken to Avoid Further Violations

SIs will be reviewed to identify procedures that contain a reference to another document for acceptance criteria. These procedures will be evaluated for revision. This was a commitment in LER 50-327/92006.

Date When Full Compliance Will be Achieved

TVA is in full compliance.

Violation 50-327, 328/92-03-03

"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:

- "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)."

EXAMPLE NO. 1

Reason for the Violation

The assistant shift operating supervisor (ASOS) failed to fully analyze plant conditions before shutting the reactor trip breakers.

The Unit 2 reactor had tripped and the operators were in the process of bringing the unit back on line. Prior to any restart from a reactor trip, the reactor trip breakers (RTB) must be reset and tested to verify operability. Operators are trained to not close breakers with trip signals present and the ASOS was aware that the trip signal was still present from the reactor trip; however, the ASOS assumed that the jumpers installed for the PTB test bypassed all trip signals. Annunciator status was not verified with the surveillance instructions and annunciator status was not discussed with test personnel.

Additional details of this event are contained in LER 50-328/92001 dated March 11, 1992.

Corrective Steps That Have Been Taken and the Results Achieved

The ASOS has been counseled on the need to fully analyze plant conditions and to anticipate responses to actions taken.

Corrective Steps That Have Been Taken to Avoid Further Violations

SI-93, "Reactor Trip Instrumentation Functional Tests Conditional 31 Days Prior to Startup," used to perform the RTB test, was revised to ensure that reactor trip signals have been cleared before test performance.

The event and the lessons learned have been reviewed and included in operator training.

Date When Full Compliance Will be Achieved

TVA is in full compliance.

EXAMPLE NO. 2

Reason for the Violation

The reason for failing to comply with AI-30 was determined to be an oversight on the part of the SOS.

Following the receipt of an unexpected annunciator alarm during the performance of a test, the alarm must be evaluated and a determination made as to the reason for the alarm. This must be accomplished before continuation of the test. If the evaluation reveals that the unexpected alarm should have been received, the test may continue. The basis for continuing the testing activity must be logged and a procedure change is to be initiated addressing the annunciator alarm prior to the next performance of the test.

In this event, the unexpected annunciator was discussed, and an adequate evaluation was performed prior to continuing the test. The SOS was involved in the discussion and evaluation; however, he did not ensure that the required procedure change was pursued in a timely manner, nor did he ensure the basis for the test continuance was documented.

Corrective Steps That Have Been Taken and the Results Achieved

The responsible SOS has been counseled concerning his oversight and failure to comply with procedures.

The Main Turbine Overspeed and Oil System Test O-PI-OPS-047-760.0 was revised to address important annunciation that operators could expect to receive during the turbine test.

Corrective Steps That Will be Taken to Avoid Further Violations

This event was reviewed with the SOSs.

Date When Full Compliance Will be Achieved

TVA is in full compliance.

Violation 50-327, 328/92-03-05

"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:

"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)."

Reason for the Violation

Personnel responsible for implementing the annunciator disablement procedure were not fully cognizant of the requirements and associated responsibilities.

The SOS authorized disablement of the annunciator on December 30, 1991, based on the determination that it was a nuisance alarm. A work request (WR) was initiated indicating that the alarm had been disabled and a safety evaluation, i.e., 50.59 review, was required. The WR was forwarded to the Work Control Group shift manager. The procedure governing annunciator disablement requires the Work Control shift manager to contact Technical Support systems engineers to initiate the required safety evaluation review. The shift manager noted that a safety evaluation was required, but was not cognizant that he was responsible for notifying Technical Support to perform the safety evaluation. This lack of understanding of responsibilities resulted from inadequate communications of the procedural requirements to the personnel responsible for implementing the procedure.

Corrective Steps That Have Been Taken and Results Achieved

The safety evaluation was written on February 18, 1992. The condition causing the alarm was corrected and the annunciator returned to service on March 3, 1992. A memo dated March 3, 1992, was written to the Work Control shift managers explaining their responsibilities relative to initiating and tracking safety evaluation reviews.

Corrective Steps That Will be Taken to Avoid Further Violations

The procedures governing disabling annunciators will be revised to streamline and clarify the process, including a time limit on repairing the component and initiating a safety evaluation, if appropriate.

Date When Full Compliance Will be Achieved

TVA is in full compliance.

Enclosure 2

Commitment

Violation 50-327/92-03-05

The procedures governing disabling annunciators will be revised before restart from Unit 2 Cycle 5 refueling outage.