

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 16, 1984 <sup>84 JUL 18</sup> P 2:16

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/84-11 AND 50-328/84-11 - RESPONSE TO VIOLATIONS

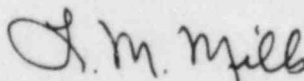
The subject OIE inspection report dated June 14, 1984 from R. C. Lewis to  
H. G. Parris cited TVA with five Severity Level IV Violations. Enclosed is  
the response to the items of violation in the subject inspection report.

If you have any questions, please get in touch with R. H. Shell at  
FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are  
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Licensing

Enclosure

cc (Enclosure):

Mr. Richard C. DeYoung, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Records Center  
Institute of Nuclear Power Operations  
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ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.  
50-327/84-11 AND 50-328/84-11  
R. C. LEWIS'S LETTER TO H. G. PARRIS  
DATED JUNE 14, 1984

Item 1 (327/84-11-01)

Technical specification 3.0.4 requires that entry into an operational mode or other specified condition shall not be made unless the conditions for the limiting condition for operation (LCO) are met without reliance on provisions contained in the action requirements.

Contrary to the above, entry into an operational mode was made on two different occasions when the LCOs were not met without reliance on provisions contained in the action requirements. On April 13, 1984, unit 1 entered mode 3 with instrument 1-LT-3-38 inoperable. LCO 3.3.2.1 was not met for steam generator level channels. On April 15, 1984, unit 1 entered mode 2 with instrument 1-LT-68-320 inoperable. LCO 3.3.3.7 was not met for pressurizer level channels. The licensee immediately complied with the applicable action requirements until the instruments were returned to service.

This is a Severity Level IV violation (Supplement I). This violation applies to unit 1 only.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

With unit 1 in mode 4 during startup after refueling, the technical specifications were consulted to determine the requirements to change modes with steam generator level transmitter 1-LT-3-38 inoperable. Limiting condition for operation (LCO) 3.3.1.1 items 14 and 15 were applicable for mode 2, therefore allowing entry into mode 3. LCO 3.3.2.1 item 5 was applicable to mode 3, but operation and mode change were not prohibited. The unit entered mode 3 at 0905 CST on 04/12/84 with the level transmitter out of service, but personnel had overlooked LCO 3.3.2.1 item 6c which required the transmitter to be operable for entry into mode 3.

At 1500 CST on 04/15/84 with unit 1 in mode 3 and diluting to criticality, sampling of the reactor coolant system (RCS) was initiated using procedure RTI-3, "Initial Criticality." During the previous refueling outage, a modification to the RCS sampling configuration was made which routed the sample line to the low side tap of pressurizer level transmitter 1-LT-68-320. This modification had been performed on unit 2 with no adverse effect on the operation of the transmitter. Sampling was being performed at twenty-minute intervals with the sample lines being continuously purged.

At 1630 CST, mode 2 was achieved, and at 1715 CST, the operator discovered the level transmitter 1-LT-68-320 inoperable. Investigation revealed that the sampling had made the instrument inoperable while in mode 3.

3. Corrective Steps Which Have Been Taken and the Results Achieved

The bistables for steam generator level transmitter 1-LT-3-38 were tripped as required by technical specifications upon discovery of the overlooked LCO 3.3.2.1 item 6c. 1-LT-3-38 was returned to service on 04/13/84. Personnel have been reinstructed on the importance of checking all applicable LCOs prior to mode change. Licensee Event Report (LER) SQRO-50-327/84024 was submitted on this event.

The bistables for pressurizer level transmitter 1-LT-68-320 were tripped as required by technical specifications upon discovery of the inoperable instrument. 1-LT-68-320 was returned to service on 04/15/84. In an attempt to prevent the pressurizer level transmitter from becoming inoperable during sampling, the sample isolation valve will be throttled during sampling. Chemical Laboratory procedures have been changed to require the shift engineer to be notified before and after samples are taken. Licensee Event Report SQRO-50-327/84025 was submitted on this event.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Technical Instruction (TI) 59, "Listing of Technical Specification Instruments", will be revised to indicate steam generator level transmitter 1-LT-3-38 to be required for entry into mode 3.

The RCS sample line will be modified to restrict flows being used for samples before startup from the next unit 1 refueling outage.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on the first event when the bistables to 1-LT-3-38 were tripped on 04/13/84. Full compliance was achieved on the second event when the bistables to 1-LT-68-320 were tripped on 04/15/84.

Item 2 (328/84-11-01)

10 CFR 50, Appendix B, Criterion III as implemented by the licensee's approved QA program (Topical Report TVA-TR75-1) section 17.2.3, "Modification Control", requires that modifications to critical structures, systems, and components (CSSC) shall be controlled to assure that "as-built" quality is not degraded.

Contrary to the above, modifications to CSSC were not controlled in that ECN 22-78, implementing Engineering Design non-conforming report NCR MEB 79-10, which addressed the need to rewire pressurizer PORV control circuitry and committed to do so before unit fuel loading, did not get implemented on a unit 2 PORV control circuit (PS 68-337 which affects PCV 68-332) until April 1984.

This is a Severity Level IV Violation (Supplement I). This violation applies to unit 2 only.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The control circuitry modification was scheduled to be performed on the unit 2 pressurizer power operated relief valves before an operating license being issued. The cause of this violation is considered to be either failure to follow the applicable construction procedures or inadequate construction procedures, but the exact cause has not been identified because of the approximate three-year time period since construction procedures have been used (unit 2 received a low power testing license in June 1981).

3. Corrective Steps Which Have Been Taken and the Results Achieved

The PORVs were properly rewired and satisfactorily tested upon discovery of the error.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Since unit 2 has received an operating license, all modifications are controlled by Administrative Instruction (AI) 19, "Plant Modifications". This condition is considered an isolated case and, since the construction procedures are no longer utilized for plant modifications, no additional corrective action is deemed necessary.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on 04/05/84 when the PORVs were satisfactorily tested.

Item 3 (328/84-11-03)

10 CFR 50, Appendix B, Criterion XVII, "Quality Assurance Records", as implemented by the licensee's approved QA program (Topical Report TVA-TR75-1) section 17.2.17 requires that records of modifications and tests be compiled, stored, and retrievable.

Contrary to the above, the licensee failed to retrieve records showing evidence of modification (required by NCR MEB 79-10, "Control Loop Bistables Fail to Undesirable Position on Loss of Power", and implemented by modification ECN 22-78) or post-modification testing on a unit 2 PORV control circuit (PS 68-336 which affects PCV 68-340).

This is a Severity Level IV Violation (Supplement I). This violation applies to unit 2 only.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The control circuitry modification was scheduled to be performed on the unit 2 pressurizer power operated relief valves before an operating license being issued. The as-constructed drawings were used as documentation of the plant installation when systems, components, or equipment were transferred from the Construction organization to the Nuclear Power organization. The cause of this violation may have been a failure to include adequate details in the as-constructed drawings, but the exact cause has not been identified because of the approximate three-year time period since construction procedures have been used (unit 2 received a low power testing license in June 1981).

3. Corrective Steps Which Have Been Taken and the Results Achieved

The PORVs were properly rewired and satisfactorily tested upon discovery of the error.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Since unit 2 has received an operating license, all modifications are controlled by Administrative Instruction (AI) 19, "Plant Modifications". This condition is considered an isolated case and, since the construction procedures are no longer utilized, no additional corrective actions are deemed necessary.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on 04/05/84 when the PORVs were satisfactorily tested.

Item 4 (328/84-11-04)

10 CFR 50, Appendix B, Criterion XI as implemented by the licensee's approved QA program (Topical Report TVA-TR75-1) section 17.2.11, "Test Control", requires that testing be performed to demonstrate that critical structures, systems, and components (CSSC) will perform satisfactorily in service and that modifications be tested in accordance with the original design and testing requirements or acceptable alternatives.

Contrary to the above, a CSSC modification was not tested for satisfactory performance in that an Engineering Design modification (ECN 22-78) on the pressurizer power operated relief valve (PORV) control circuit was not required to be tested for the fail-safe portion of the modification by the preoperational test procedure W-1.2A, "Reactor Coolant System Functional Test".

This is a Severity Level IV Violation (Supplement I). This violation applies to unit 2 only.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The cause of this violation has been determined to be personnel failing to incorporate these additional test requirements into the preoperational test.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Preoperational test personnel have been instructed in the importance of ensuring all test requirements are included in future post-modification tests.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Since the preoperational test will not be utilized further and this condition is considered an isolated case, no further corrective action is deemed necessary.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on 04/06/84 when the PORVs were satisfactorily tested and when personnel were reinstructed.

Item 5 (328/84-11-02)

10 CFR 50, Appendix B, Criterion V as implemented by the licensee's approved QA program (Topical Report TVA-TR75-1) section 17.2.5, "Instructions, Procedures, and Drawings", requires that activities affecting quality be accomplished in accordance with documented drawings of a type appropriate to the circumstances. Drawings 45N668-1 and D8059895B are two drawings showing the wiring of the power operated relief valve (PORV) bistable pressure switches associated with the auxiliary control loops.

Contrary to the above, on March 31, 1984, activities affecting quality were not accomplished in accordance with appropriate documented drawings in that maintenance on the auxiliary control loop PORV bistable pressure switches was performed using only drawing 45N668-1, resulting in miswiring correctly wired pressure switches.

This is a Severity Level IV Violation (Supplement I). This violation applies to both units.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The cause of this violation has been determined to be a personnel error in failing to obtain and review all applicable available drawings.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Training was conducted to remind Instrument Maintenance personnel to obtain and review all available applicable drawings during maintenance and modifications.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Instrument Maintenance procedures were revised to provide details on the PORV wiring configuration to prevent future confusion. An additional requirement was included in AI-25, "Drawing Control After Unit Licensing", to require that all discrepancies found between as-constructed drawings and plant features be brought to the attention of the shift technical advisor as soon as practical. The STA will evaluate the discrepancy and notify plant management of those differences which are determined to have safety impact.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on 04/12/84 when Instrument Maintenance personnel were reinstructed on the importance of reviewing all applicable drawings.