

JUN 14 1984

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority  
Sequoyah Units 1 and 2

Docket Nos. 50-327 and 50-328  
License Nos. DPR-77 and DPR-79

The following violations were identified during an inspection conducted on April 6 - May 5, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 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.

2. 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 prior to unit fuel loading, did not get implemented on a unit 2 PORV control circuit (PS 68-337 which effects PCV 68-334) until April 1984.

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

3. 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.

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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.

4. 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.

5. 10 CFR 50, Appendix B, Criterion V as implemented by the licensees 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). The violation applies to both units.

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

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Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: JUN 14 1984