

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah Units 1 and 2

Docket No. 50-327 and 50-328
License No. DPR-77 and DPR-79

During an NRC inspection conducted from November 26, 1995, through January 6, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.8.1.a requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operations)." Appendix A of Regulatory Guide 1.33, Section 3 includes procedures for startup, operation, and shutdown of safety-related PWR systems.
1. O-SO-36-3, SECONDARY SYSTEM BORIC ACID INJECTION, Revision 7, Precaution and Limitation Section 3.0, Step F requires an Auxiliary Feedwater Pump in service while injection is in progress.
 2. SSP-2.51, RULES OF PROCEDURE USE, Revision 5, Section 2.2.2.A requires continuous use procedures be present and directly referred to during the performance of work steps. O-SO-62-7, BORON CONCENTRATION CONTROL, Revision 2 was the continuous use procedure required for reactor coolant dilution evolutions.
 3. O-PI-OPS-000-606.0, Rev. 13, BALANCE OF PLANT TEMPERATURE MONITORING SYSTEM, Section 6.1 [2], requires that if the 6900 volt Shutdown Board Room Temperature exceeds 80 °F, (a) initiate actions to expeditiously restore the 6900 volt Shutdown Board Room temperature to less than 80 °F, (b) monitor and record the 6900 volt Shutdown Board Room temperature in accordance with Appendix C (of that procedure, which requires hourly temperature monitoring).

Contrary to the above,

1. On November 29, 1995, operations personnel attempted to inject boric acid into the Unit 1 steam generators using the Auxiliary Feedwater system flowpath without assuring an Auxiliary Feedwater pump was in service as required by O-SO-36-3. This condition resulted in portions of the Auxiliary Feedwater system being subjected to higher than normal pressures (1650 psig).
2. On November 30, and December 1, 1995, operators conducted reactor coolant dilution evolutions on Unit 1 without O-SO-62-7 present and directly referred to during the performance of work steps.

Enclosure 1

3. On December 8, 1995, the licensee failed to follow procedure O-PI-OPS-000-606.0, Rev. 13. Specifically, temperature as measured by Temperature Indicators TI-8 and TI-9 exceeded 80 °F, and the licensee did not initiate actions to expeditiously restore the 6900 volt Shutdown Board Room temperature to less than 80 °F, or monitor and record the 6900 volt Shutdown Board Room temperature in accordance with Appendix C of that procedure. This resulted in the failure to identify a problem with a chiller to the 6900 volt Shutdown Board Rooms and Auxiliary Control Room areas, which lead to the malfunction and/or failure of various safety related and important to safety instruments.

This is a Severity Level IV violation (Supplement I).

- B. Technical Specification 6.8.1.a requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operations)." Appendix A of Regulatory Guide 1.33, Section 9 includes procedures for performing maintenance.

SSP-6.23, Rev. 4, MAINTENANCE MANAGEMENT SYSTEM-TROUBLESHOOTING, section 5.1.3 [6], requires that the foreman ensure personnel are qualified for the troubleshooting activities being performed. Section 5.1.3 [6] requires of performers that if at any time the scope of the troubleshooting changes such that the troubleshooting instructions are no longer valid or are inadequate, then ensure the troubleshooting plan is revised.

Contrary to the above, on December 5, 1995, licensee failed to follow procedure SSP-6.23, Revision 4. Specifically, licensee maintenance foreman failed to ensure that technicians performing troubleshooting activities on the Beta Annunciator System were qualified to perform the task. The licensee also failed to stop work and revise the troubleshooting plan when it became apparent that the plan was inadequate. This resulted in an unanticipated power increase to approximately 102% on Unit 1 when an incorrect point in an annunciator cabinet was jumpered out which resulted in tripping a breaker in a process protection rack.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the

corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 30th day of January 1996