

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 December 6, 1984 - January 5, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

- A. 10 CFR 50, Appendix B, Criterion XI "Test Control" as implemented by the licensee's approved QA program (Topical Report TVA-TR 75-1) 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 malfunctions are identified in a timely manner.

Contrary to the above, in the instances cited below, the licensee failed to perform adequate testing of components to identify deficiencies.

1. In December 1982, Units 1 and 2 P-11 block switches received inadequate post-modification testing in that not all switch functions were tested which precluded detection of a deficient switch operation regarding an undesirable, momentary actuation of the switch to the reset (unblock) position. On December 16, 1984, cycling of the P-11 block switch while the Unit 2 was in mode 3 resulted in an inadvertent actuation of the safety injection system.
2. On December 22, 1982, the licensee failed to perform an adequate post modification test for Unit 1 post-accident radiation monitors located on the Reactor Coolant Drain Tank sump line and the Reactor Building Floor and Equipment Drain sump line. Adequate testing for satisfactory performance of the radiation monitors and associated valves designed for closure on high radiation would have detected incorrect installation of the radiation monitors. This discrepancy was identified on November 20, 1984. Post-accident radiation monitors are required by Licensee Condition 2.C.(22).F., however, incorrect installation of subject radiation monitors did not compromise containment isolation function under accident conditions.

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

- B. 10 CFR 50, Appendix B, Criterion XVI "Corrective Action" as implemented by the licensee's approved QA program (Topical Report TVA-TR 75-1) section 17.2.16 "Adverse Conditions and Corrective Action" requires that in the case of significant conditions adverse to quality, measures shall be taken to assure that the cause of the condition is determined and corrective action is taken to preclude repetition.

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Contrary to the above, the licensee has taken inadequate corrective action to preclude repetition of inadvertent safety injections due to a switch malfunction. The Design Change Request (DCR) process initiated on June 26, 1980, was deficient in that it did not properly determine the cause of the problem and simply required replacement of the same type of existing switches. The DCR was implemented on Unit 1 in February 1983 and on Unit 2 in December 1982. On December 16, 1984, Unit 2 experienced another inadvertent safety injection due to the same switch malfunction.

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

- C. 10 CFR 50, Appendix B, Criterion V requires the licensee to establish measures to assure that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Contrary to the above, the licensee failed to prescribe activities affecting quality by documented procedures of a type appropriate to the circumstances in that a potential nonconformance concerning post-accident radiation monitors which was identified on November 20, 1984, was not promptly documented. The nonconformance was documented sixteen days after identification on December 6, 1984.

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

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: FEB 13 1985