

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah, Unit 2

Docket No. 50-328
License No. DPR-79

During an NRC inspection conducted July 5 - August 1, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. Appendix A to Regulatory Guide 1.33 requires that administrative procedures be established to ensure that maintenance that can affect the performance of safety-related equipment be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.
- (1) Site Standard Practice 12.7, HOUSEKEEPING/TEMPORARY EQUIPMENT CONTROL, Revision 7, Section 3.1.1.B, states, in part, that the foreman or work supervisor in charge of an activity shall ensure that proper cleanliness is maintained during and after completion of a work activity.
 - (2) Maintenance Instruction (MI) 10.14, APPLICATION REPAIR OF PROTECTIVE COATINGS IN THE REACTORS AND AUXILIARY BUILDINGS, Revision 24, Section 3.6, states, in part, that equipment that may be damaged by coating work activities shall be protected by covering, enclosing, or removal from the work area to ensure that no equipment degradation occurs. Section 3.8, states, in part, that precautions shall be taken to ensure that coating of components with moving parts are not compromised for their intended design function due to binding, resulting from coating material i.e., mechanical linkage on the Diesel Generators.

Contrary to the above, the previous procedures were not properly established or implemented as indicated in the following examples:

On or before July 24, 1992, modifications personnel failed to maintain adequate cleanliness control during floor stripping activities in the Turbine Driven Auxiliary Feedwater Pump room. This condition resulted in a failure of the pump to pass its required post-maintenance test and also resulted in a significant delay in returning the safety-related pump to operable status. On July 29, 1992, operability of the Unit 2 Turbine Driven Auxiliary Feedwater Pump was again compromised during room refurbishment

(repainting) activities due to modifications personnel allowing epoxy coating to be applied to the mechanical linkages and other equipment necessary for normal operation of the pump governor valve.

This is a Severity Level IV violation (Supplement 1).

- B. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. Appendix A to Regulatory Guide 1.33 requires that administrative procedures be established to ensure that maintenance that can affect the performance of safety-related equipment be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

- (1) Site Standard Practice (SSP) 12.6, INDEPENDENT VERIFICATION, Revision 1, specifies provisions for independent and second-party verification. Section 3.3.4 states, in part, that a second party verification and a functional test may be specified instead of an independent verification in work orders and approved plant procedures. This is provided that the testing does, in fact, verify each component under consideration.

SSP-12.6, Section 3.1.5 further states, in part, that the preparers of site procedures/instructions shall ensure that applicable site procedures/instructions provide for independent verification/second party verification as appropriate.

- (2) Preventive Maintenance procedure PM 030272002 detailed actions for establishing correct configuration after work activities were performed on flow switch 2-FS-74-24.

Contrary to the above, the preceding procedures were not properly established or implemented as indicated in the following example:

On or before July 1, 1992, the licensee failed to implement the requirements of SSP-12.6 and PM 030272002 resulting in improper termination of a lead to flow switch 2-FS-74-24. These actions resulted in a mislaid wire termination and potentially affected operability of the 2B-B residual heat removal pump.

This is a Severity Level IV Violation (Supplement 1).

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, Sequoyah, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason

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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. If an adequate reply is not received within the time specified in this Notice, an order or 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.

Dated at Atlanta, Georgia
this 12th day of August, 1992