

Official

SEP 29 1992

Docket No. 50-327
License No. DPR-77
EA 92-155

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford
Vice President, Nuclear
Assurance, Licensing & Fuels
3B Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL
PENALTY - \$62,500 (NRC INSPECTION REPORT
NO. 50-327/92-29 AND 50-328/92-29)

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by Mr. W. Holland on August 10 - 20, 1992, at the Sequoyah Nuclear Plant. This special inspection included a review of the circumstances surrounding the potential inoperability of the Unit 1B safety injection (SI) pump due to an electrical breaker problem that existed from July 31 - August 10, 1992, while Unit 1 was operating in MODE 1, and which, when discovered was reported by your staff as required by 10 CFR 50.72. The report documenting this inspection was sent to you by letter dated August 28, 1992. As a result of this inspection, a significant failure to comply with NRC regulatory requirements was identified. An enforcement conference was conducted in the Region II office on September 9, 1992, to discuss the apparent violation, its cause, and your corrective actions to preclude recurrence. A summary of the enforcement conference was sent to you by letter dated September 11, 1992.

The violation in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) involved the 1B SI pump being in an inoperable condition due to the manual trip button on the 6.9kV electrical breaker being stuck in the trip position. On August 10, 1992, ASME Section XI testing of the 1B SI pump was initiated and the SI pump would not start. The operator initiated actions to determine the cause of failure and subsequently found that the SI pump's 6.9kV electrical breaker was tripped because the manual trip button was stuck in the trip position due to interference from a cover plate on the breaker. By loosening the cover plate and releasing the manual trip button the operator was able to return the SI pump to its operable status.

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Technical Specification Limiting Condition of Operation 3.5.2 requires that two independent Emergency Core Cooling System (ECCS) subsystems be operable during operation in MODES 1, 2, and 3. An ECCS subsystem consists of one operable centrifugal charging pump, one operable SI pump, and one operable residual heat removal pump. The 1B SI pump was inoperable due to breaker inoperability from July 31 to August 10, 1992. Therefore, in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy) 10 CFR Part 2, Appendix C (57 FR 5791, February 18, 1992), this violation has been categorized at Severity Level III because an important safety-related component was unable to perform its safety function for an extended period of time.

Although the precise reason as to why or how the manual trip button became lodged in the trip position cannot be established, the available information supports the conclusion that personnel error related to maintenance activities performed on the breaker on July 31, 1992, was the immediate cause. Your systematic approach to a root cause determination assessed the likely cause as a design weakness and a lack of attentiveness when reinstalling the breaker following maintenance. Also, of concern is the apparent lack of attentiveness demonstrated when the independent verification of the breaker was performed following the maintenance and the breaker's reinstallation. That verification also apparently missed the problem with the trip button.

The NRC staff recognizes that immediate corrective action was taken when the violation was identified, particularly the prompt actions by the operator to determine the nature of the problem and to immediately restore the pump to operable status.

To emphasize the importance of ensuring that important safety components are able to perform their intended safety function and that proper attention is given to the performance of maintenance activities and subsequent verification, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Nuclear Reactor Regulation, Regional Operations and Research, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of \$62,500 for the Severity Level III violation. The base value of a civil penalty for a Severity Level III violation is \$50,000.

The escalation and mitigation factors in the Enforcement Policy were considered. Mitigation of 25 percent was warranted for identification because even though the violation was considered to be self-disclosing, immediate actions were initiated to conduct a thorough root cause analysis. Mitigation of 50 percent was warranted for your prompt and comprehensive corrective actions, particularly the immediate personal involvement of

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senior managers to address the personnel-related issues contributing to this event. The formation of senior management teams on site designed to convey management expectations to all levels of the organization is particularly noteworthy. Escalation of 100 percent was applied for licensee performance because of your continuing poor performance with regard to matters involving the conduct of operations and the overall problem of configuration control. In our letter dated July 2, 1992, which contained a Notice of Violation and Proposed Imposition of Civil Penalty (EA 92-092), the subject of continuing poor performance was discussed and this current event is viewed as a continuation of those problems. Our letter of August 28, 1992, reiterated our concern regarding your ineffective management actions to "correct problems associated with inadequacies in post-maintenance testing and/or personnel performance, including verification of actual component configuration...." Finally, the plant's overall recent enforcement history supports escalation of the civil penalty under this factor. The other adjustment factors in the Enforcement Policy were considered, and no further adjustment to the base civil penalty is considered appropriate. Therefore, based on the above, the base civil penalty has been increased by 25 percent.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

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Should you have any questions concerning this letter please contact us.

Sincerely,

ORIGINAL SIGNED BY L. A. REYES

Stewart D. Ebnetter
Regional Administrator

Enclosure:
Notice of Violation and Proposed
Imposition of Civil Penalty

cc w/encl:
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(cc w/encl con't: see next page)

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County Judge
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State of Tennessee

SEP 29 1992

bcc w/encl:

PDR

SECY

OGC

CA

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SEbnetter, RII

JLieberman, OE

JLuehman, OE

JGoldberg, OGC

FIngram, PA

TMurley, NRR

JPartlow, NRR

Enforcement Coordinators

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EA File

Day File

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NRC Resident Inspector

U.S. Nuclear Regulatory Commission

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Soddy-Daisy, TN 37379

(see attached sheet for concurrence)

OE

JLuehman

9/ /92

RII

SEbnetter

9/ /92

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JLieberman

9/ /92

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JSniezek

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EMerschhoff

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CFEvans

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9/22/92