

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

34 SEP 7 1984
September 4, 1984

U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/84-17 AND 50-328/84-17 - RESPONSE TO VIOLATIONS

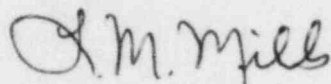
The subject OIE inspection report dated August 2, 1984 from R. C. Lewis to
H. G. Parris cited TVA with two Severity Level IV violations. Enclosed is
the response to the items of violation in the subject inspection report.

If you have any questions, please get in touch with R. H. Shell at
FTS 858-2688.

To the best of my knowledge, I declare the statements contained herein are
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Licensing

Enclosure

cc (Enclosure):

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
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ENCLOSURE

RESPONSE - NRC INSPECTION REPORT
50-327/84-17 AND 50-328/84-17
R. C. LEWIS' LETTER TO H. G. PARRIS
AUGUST 2, 1984

Item 327, 328/84-17-01

Technical Specification 3.6.1.1 requires that primary containment integrity shall be maintained in modes 1, 2, 3, and 4. Surveillance requirement 4.6.1.1.a requires that primary containment integrity shall be demonstrated by verifying that manual valves required to be closed during an accident are closed and secured in their positions.

Contrary to the above, primary containment integrity was not maintained in that on June 7, 1984, valve 1-33-704, containment isolation valve for the service air system, was shut but not secured by a locking device. The unit was in mode 3, hot standby.

This is a Severity Level IV violation (Supplement I). This violation applies to unit 1 only.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

System Operating Instruction (SOI) 88.1A, "Establishing Containment Integrity," and Surveillance Instruction (SI) 14, "Containment Integrity Verification," were performed on April 9, 1984 and April 5, 1984, respectively, and double-person verified. This inspection was performed as required after a scheduled unit 1 outage. On April 21, 1984, valves 1-33-704 and 1-33-740 were required to be opened so that service air could be supplied to containment during an unscheduled outage. Upon completion of the outage, the outside containment isolation valve, 1-33-740, was double verified closed since SI-14(A) was required for all containment isolation valves outside containment. SI-14(B) for containment isolation valves inside containment was not required since it had been performed within 92 days. The Configuration Log, per OSLA58, had logged 1-33-704 as being in the abnormal position-open. The log failed to state that this was a locked closed valve. To proceed to mode 4, the valve had to be verified returned to its normal position. On May 4, 1984, the valve was verified closed but was not checked for being secured. A factor which contributed to missing the requirement for locking the valve was the fact that the chain and lock were missing from the valve.

3. Corrective Steps Which Have Been Taken and the Results Achieved

- a. The valve was immediately verified closed and secured with a lock and chain.
- b. An inspection was performed per SI-14 to verify containment integrity. No additional discrepancies were found.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

- a. Emphasis will be made during training on the requirements to maintain containment integrity during modes 1, 2, 3, and 4. Additionally, a letter will be sent to all shift engineers, ASEs, UOs, AUOs, and AOs stressing this requirement.
- b. The configuration logs are being revised to contain two-person verification.

5. Dates When Full Compliance Will Be Achieved

Full compliance was achieved on June 7, 1984, when the valve was locked and secured.

Item 327, 328/84-17-02

Technical Specification 3.5.2 requires that two independent emergency core cooling system (ECCS) subsystems shall be operable in modes 1, 2, and 3. Surveillance requirement 4.5.2.c requires that ECCS operability shall be demonstrated by verifying that no loose debris is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions.

Contrary to the above, ECCS subsystem operability was not maintained in that on June 7, 1984, a large plastic bag (approximately 36" x 48") was present in the lower containment area that could be transported to the containment sump during LOCA conditions and cause restriction of the pump suction. The unit was in mode 3, hot standby.

This is a Severity Level IV violation (Supplement I). This violation applies to unit 1 only.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Personnel working in lower containment between May 8, 1984 and June 7, 1984 failed to remove a plastic bag.

3. Corrective Steps Which Have Been Taken and Results Achieved

An investigation was performed to try to locate the personnel involved in this incident. A time period from May 8, 1984 (the last performance of SI-187 containment inspection) to June 7, 1984 was determined to have been the period that the foreign material was brought into lower containment. A review of the radiation work permits (RWPs) and the AI-8 containment entry checklist resulted in a list of all personnel that had entered lower containment. These personnel were questioned on their reason for entry, what material was brought in and taken out by them, and what activity they performed while in containment. All personnel made written statements that all material they had taken to lower containment was removed and that no loose debris remained. Each person was also briefed on the requirements in AI-8 to inspect the route to and from work areas to ensure that no loose debris is present. Even though this investigation did not result in finding the person(s) responsible for leaving the material in lower containment, personnel awareness in regard to containment cleanliness requirements in modes 1 through 4 was significantly increased.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

A revision to AI-8, "Containment Access," will be made to clarify and strengthen the signed statement by personnel on their responsibility to verify the work area and route to the work area is free from debris.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 7, 1984.