

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

84 SEP 26 P 3: 10  
September 21, 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  
50-327/83-26 AND 50-328/83-26 - REVISED RESPONSE TO ITEM C OF THE NOTICE OF  
VIOLATION

The subject OIE inspection report dated December 21, 1983 from R. C. Lewis to H. G. Parris cited TVA with three Severity Level IV Violations. In response to your June 25, 1984 letter to H. G. Parris, an additional response to Item C of the Notice of Violations was submitted by my July 30, 1984 letter to you. As a result of a telephone conversation on August 29, 1984 with D. M. Verrelli of your staff, we are enclosing a revision to the additional response to Item C of the Notice of Violation.

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*  
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  
Atlanta, Georgia 30339

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ENCLOSURE

Item C (328/84-26-01)

Technical Specification 3.3.3.7, Table 3.3-10, items 12, 13, and 14 requires that each pressurizer power operated relief valve (PORV), block valve and safety valve have two channels of position indication operable. Of these two channels per valve to provide adequate position indication, one channel for the PORVs and safety valves shall be the acoustic monitors. Technical Specification 3.0.4 requires that entry into an Operational Mode or other specified condition shall not be made unless the conditions for the LCO are met without reliance on provisions contained in the action requirements.

Contrary to the above, Unit 2 entered Mode 2 at 11:50 p.m. CST, on October 12, 1983, with all acoustic monitors inoperable in that the Control Room panel was removed to the shop for repairs. The conditions for LCO 3.3.3.7 were not met without reliance on provisions contained in the action requirements. The acoustic monitors were restored to service on October 13, 1983.

This is a Severity Level IV Violation (Supplement I). This violation applies to Unit 2 only.

1. Admission or Denial of the Alleged Violation

TVA denies this violation.

2. Reasons for the Denial

An unfortunate oversight occurred in our denial letter dated July 30, 1984 in that a statement was made to the effect that the written words of a specification are more important than the intent. This was an unfortunate statement since SQN management has always considered the intent of the technical specification to be the dominant factor. It is important to note that when the acoustic monitors became an issue between TVA and NRC in January 1984, SQN management issued a formal interpretation of Technical Specification 3.3.3.7 to Operations which required the acoustic monitors as one channel of position indication for the pressurizer safety valves.

As stated in letters to NRC dated September 7, 1979, December 10, 1980, and February 16, 1982, in response to NUREG 0578 nd 0737, Sequoyah has four separate methods of determining safety valve position (i.e., open or closed).

- a. Temperature sensors downstream of each safety valve (one per valve). Temperature indication and alarm are provided in the main control room.
- b. Pressurizer relief tank has temperature, pressure, and level indication and alarm in the main control room.

- c. Acoustic flow monitors are mounted downstream of each safety valve (one per valve). A flow indicating module in the main control room is calibrated to detect failure of a valve to reclose. An alarm in the main control room will actuate when any valve is not fully closed.
- d. Pressurizer pressure indicator and alarm in the main control room.

TVA agrees that a review of Supplement 1 to the Sequoyah Safety Evaluation Report (SER) shows the direct means of providing pressurizer safety valve position indication is the acoustic monitors with the temperature sensors downstream of each safety valve, pressurizer relief tank temperature/pressure level indicators, and pressurizer high pressure sensors and alarms being backup methods.

Conversely, it is important to note that the technical specifications did not, and do not, specify the acoustic monitors as one of the "2/valve" required channels for pressurizer safety valve position indication. Neither Technical Specification 3.3.3.7 nor its BASES provides information that leads to an interpretation that the intent of the specification for these valves requires acoustic monitors as one of the two channels. Based on the information provided in the technical specifications SQN contends no violation occurred.

We do believe the violation, as stated, pointed out a need to examine the wording of Technical Specification 3.3.3.7, particularly since the SER on the Watts Bar Nuclear Plant indicates the same configuration on Watts Bar is acceptable. Consequently, consistent with our philosophy that the technical specifications and their associated BASES should be clear, we are initiating a technical specification change to LCO 3.3.3.7 and its BASES to require that the acoustic monitors be available as one of the two channels of pressurizer safety valve position indication.