

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

January 18, 1985

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

85 JAN 22 P 2: 03

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/84-29 AND 50-328/84-29 - RESPONSE TO VIOLATION

The subject OIE inspection report dated December 12, 1984 from
D. M. Verrelli to H. G. Parris cited TVA with one Severity Level V
Violation. Enclosed is the response to the item of violation in the
subject inspection report.

The delay in submittal of this response was discussed with Steve Weise of
your staff in a telephone conversation on January 18, 1985.

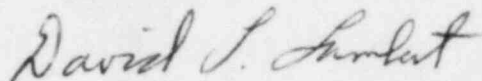
As discussed with the Resident Inspector, the date of October 19, 1984 in
the description of the violation is a typographical error and should be
October 9, 1984.

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



D. L. Lambert
Nuclear Engineer

Enclosure

cc (Enclosure):

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

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ENCLOSURE

RESPONSE - NRC-OIE INSPECTION REPORT
NOS. 50-327/84-29 AND 50-328/84-29
D. M. VERRELLI'S LETTER TO H. G. PARRIS
DATED DECEMBER 12, 1984

Items 50-327/84-29 and 50-328/84-29

Technical Specification Section 6.8.1. requires written procedures to be established, implemented and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 8 of Appendix A of Regulatory Guide 1.33 requires specific procedures for surveillance tests. Surveillance Instruction SI-258.2 was established to conduct surveillance activities on safety-related breakers.

Contrary to the above, as of October 19, 1984, adequate procedures were not established in that Surveillance Instruction SI-258.2 failed to provide cautionary information in an appropriate manner to ensure maintenance of control power to diesel generator 2A-A during testing of breaker 213 on 125 VDC Vital Battery Board III. This resulted in an inadvertent auto start of all diesel generators when control power to diesel generator 2A-A was removed.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation if Admitted

Electrical Maintenance and Operations personnel were performing a functional test of breaker 213 on the 125 Volt Vital Battery Board III in accordance with SI-258.2, "Inspection of Molded Case and Lower Voltage Circuit Breakers." Fuse column D, which supplies control power to the 2A-A diesel generator emergency start circuit, should have been provided with an alternate power source before breaker 213 was opened, but, due to less than adequate presentation of precautions associated with start of the diesel generators upon loss of this fuse column, it was not. SI-258.2 contained a note to use Maintenance Instruction MI-10.13, "Ground Detection on Vital Battery Boards," to provide the alternate power. The importance of maintaining the control power had not been stressed to the personnel involved.

With no alternate power to fuse column D, the opening of breaker 213 resulted in loss of control power to the diesel generator 2A-A emergency start relay. A loss of control power to a diesel generator emergency start relay results in automatic starting of the remaining three diesel generators. This incident occurred at 1600 CST on October 9, 1984, with unit 1 in mode 1 at 100 percent power, and unit 2 in mode 5.

3. Corrective Actions Taken and Results Achieved

The breaker was closed immediately after personnel were informed of the automatic diesel generator starts. The diesel generators were stopped and reset at 1615 CST on October 9, 1984. NRC was notified of this event on October 9, 1984 per 10 CFR 50.72(b)(2)(ii). Licensee Event Report (LER) SQRO-50-327/84066 was submitted per 10 CFR 50.73(a)(2)(iv).

A temporary change was made to SI-258.2 to include the necessary steps to provide alternate power when the breaker is being closed. With these procedural changes, personnel involved in the SI performance were given instruction in this event, and on October 24, 1984, the surveillance was satisfactorily performed on this breaker. This SI is performed on an 18-month schedule. The temporary change has expired, but a permanent revision will be in place before the next performance of this SI.

4. Corrective Actions Taken to Avoid Further Violations

SI-258.2 has been submitted for permanent revision to include the necessary steps to provide alternate power when the breaker is being tested and to include a signoff to ensure that the alternate power is provided to the fuse column. This issuance of the revised SI will be completed by March 1, 1985.

5. Date When Full Compliance Will Be Achieved

Compliance was achieved on October 24, 1984 when the surveillance was temporarily revised and satisfactorily performed. Full compliance will be achieved by March 1, 1985 with issuance of the permanent revision.