

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah Units 1 and 2

Docket No. 50-327 and 50-328
License Nos. DPR-77 and DPR-79

As a result of the inspection conducted on October 6 thru November 5, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification 2.2.1, Table 2.2-1, item 7 and Technical Specification 3.3.1.1 requires that the reactor trip systems overtemperature delta-T (OTΔT) instrumentation trip setpoint be less than or equal to the computed trip setpoint values. With a setpoint less conservative than a maximum of 2% in excess of computed setpoint, the channel is to be declared inoperable and the action statement of Technical Specification 3.3.1.1 applied. A minimum of 3 OTΔT channels is required to be operable.

Contrary to the above, all four channels of OTΔT were degraded beyond the allowed 2% and thus were inoperable. An erroneous non-conservative data value existed in the program utilized in calibrating the error signal generating circuitry since Unit 1 cycle 2 restart in January 1983. Upon discovery on October 25, 1983, the licensee immediately complied with Technical Specification 3.0.3 and corrected the calibration error.

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

- B. Technical Specification 3.7.9 requires all safety-related snubbers be operable when in Modes 1 through 4. Tables 4.7.9.a and 4.7.9.b list the numbers of snubbers required by size for various systems. 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 Limiting Conditions for Operation (LCO) are met without reliance on provisions in the action requirements.

Contrary to the above, Unit 1 was in Mode 1 and Unit 2 in Mode 3 on October 7, 1983, with the Reactor Coolant System (RC) having less than the Technical Specification specified number of snubbers on that system. The licensee had implemented an engineering change on the RCS by installing drain lines and valves on pressurizer safety valve loop seal piping and reconfiguring the seismic supports in accordance with the seismic analysis without having affected a Technical Specification change prior to ascending

modes. The licensee conferred with NRR and regional management representatives and submitted an administrative change to the Technical Specification table as part of its immediate corrective actions.

This is a Severity Level V Violation (Supplement I). This violation applies to Unit 1 and Unit 2.

- C. 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.

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

DEC 21 1983

Date: _____