

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah Units 1 and 2

Docket Nos. 50-327 and 50-328
License Nos. DPR-77 and DPR-79

During an NRC inspection conducted from March 31 through May 11, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.8.1.a requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operations)." Appendix A of Regulatory Guide 1.33, Section 1 includes administrative procedures for shift and relief turnover and log entries and Section 8 provides procedures for surveillance tests.
1. 2-SI-OPS-082-026.A, LOSS OF OFFSITE POWER WITH SAFETY INJECTION-DG 2A-A CONTAINMENT ISOLATION TEST, Revision 11, Section 6.10, Return to Normal, requires that systems be returned to their normal alignment following performance of the test.
 2. 2-SI-IRT-099-699.A, RESPONSE TIME TEST OF ESFAS SAFETY INJECTION SIGNAL WITH STATION BLACKOUT TRAIN A, Revision 1, Section 7.2, Restoration, requires that equipment be aligned as desired for plant conditions upon completion of the response time testing.
 3. 2-PI-OPS-000-038.1, AUXILIARY BUILDING AVO DUTY STATION SHIFT RELIEF AND ROUND SHEETS-MODES 5 & 6, Revision 3, Appendix B, Rounds Sheets, requires that the Spent Fuel Pit temperature be logged each day during the day shift.

Contrary to the above, the following examples of procedures were either inadequate or not followed and contributed to a loss of cooling to the Spent Fuel Pool for approximately 28 hours:

1. On April 22, 1996, 2-SI-OPS-082-026.A was inadequate in that it did not contain instructions for restoration of the Spent Fuel Pit Cooling.
2. On April 23, 1996, 2-SI-IRT-099-699.A was inadequate in that it did not contain instructions regarding the tripping of the C-S spent fuel pit pump and did not contain instructions for restoration of the Spent Fuel Pit cooling system following the test. Furthermore, 2-SI-IRT099-699.A was inadequate in that it incorrectly indicated that the A spent fuel pit pump was required for the response time test.

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3. On April 23, 1996, 2-PI-OPS-000-038.1 was not followed in that the Auxiliary Building Assistant Unit Operator failed to record the Spent Fuel Pit temperature as required.

This is a Severity Level IV Violation (Supplement I).

- B. Technical Specification, Section 6.8.1.e identifies the Site Radiological Emergency Plan implementation as written procedures that shall be established, implemented and maintained.

Contrary to the above, on April 3, 1996, NRC identified that the Emergency Plan Implementing Procedures were not adequately maintained. The following out-of-date procedures identified:

1. In the Control Room, Revision 17 of Emergency Plan Implementing, Procedure - 1 (EPIP), "Emergency Plan Classification Matrix," was placed in back of and behind EPIP-1 Revision 16 tabs. Revision 16 had not been removed as required.
2. In the Technical Support Center (TSC), three of the four controlled volumes of EIPs in the TSC, contained old revisions for EPIP 6, "Activation And Operation Of The Technical Support Center".
3. The licensee maintained and controlled volume of the EIPs in the NRC office, contained old revisions of EPIP 4, "Site Area Emergency," EPIP-5, "General Emergency", and EPIP-6, "Activation And Operation Of The Technical Support Center."

This is a Severity Level IV violation (Supplement VIII).

- C. 10 CFR 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor to follow their emergency plan. Section 9.2.4, Dose Assessment, of the Sequoyah's Radiological Emergency Plan states that releases of radioactivity are analyzed by the plant staff. A preliminary dose projection is performed following receipt of measured effluent release data and meteorological data. The preliminary dose projection is followed up by a more detailed assessment using computerized dose models. Manual dose assessment methods are available for use in the event that the computer is unavailable.

Contrary to the above, on April 16-17, 1996, the NRC identified that a preliminary dose projection could not be performed in that the Shift Technical Advisors were not trained in the use of Forecast Radiological Emergency Dose, the licensee's computerized dose assessment methodology and no procedure existed for manually calculating an offsite Dose Assessment.

This is a Severity Level IV violation (Supplement VIII).

- D. 10 CFR 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor to follow their emergency plan. Section

15.1, Training, Onsite, of Sequoyah's Radiological Emergency Plan states that personnel with specific duties involving the Radiological Emergency Plan, will have initial training classes and annual retraining.

Contrary to the above,

1. On April 17, 1996, the NRC identified that the seven Technical Support Center Radcon personnel had not received their annual retraining in 1995, in the use of Forecast Radiological Emergency Dose. Their training expired on January 1, 1996.
2. On April 17, 1996, the NRC identified that the Shift Technical Advisors had not received their required annual retraining on procedure O-TI-CEM-030-030.0, "Manual Offsite Dose Calculation."

This is a Severity Level IV violation (Supplement VIII).

- E. 10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained. Section 8.1.5, "Equipment, Supplies, and Supplemental Data," of Sequoyah's Radiological Emergency Plan requires the site to have sufficient equipment and supplies for the operation of the site emergency facilities. Emergency Plan Implementing Procedure (EPIP)-17, Emergency Equipment and Supplies, Appendix I, identified ten emergency two way radios (with batteries) and ten spare batteries as equipment to be provided and maintained.

Contrary to the above, on April 3, 1996, batteries for the emergency two way radios in the Operational Support Center were not adequately maintained. When the twenty batteries were tested, it was determined that six of the batteries were discharged and not capable of being charged, and ten were marginal.

This is a Severity Level IV violation (Supplement VIII).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or

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why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 5th day June of 1996