



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379-2000

Robert A. Fenech
Vice President, Sequoyah Nuclear Plant

December 21, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - DOCKET
NOS. 50-327 AND 50-328 - FACILITY OPERATING LICENSES DPR-77 AND DPR-79 -
LICENSEE EVENT REPORT (LER) 50-327/92021

The enclosed LER provides details concerning a failure to verify valve
positions for verification of containment integrity. This event is being
reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation
prohibited by technical specifications.

Sincerely,

Robert A. Fenech

Enclosure
cc: See page 2

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cc (Enclosure):

INPO Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339-3064

Mr. D. E. LaBarge, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852-2739

NRC Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy-Daisy, Tennessee 37379-3624

Mr. B. A. Wilson, Project Chief
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323-0199

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Sequoyah Nuclear Plant, Unit 1 DOCKET NUMBER (2) | PAGE (3)
051000312710F05

TITLE (4) Failure to Verify Valve Positions for Verification of Containment Integrity

EVENT DAY (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)		
11	12	09	2	1	0	12	11	Sequoyah, Unit 2	0510003128		

OPERATING MODE (9) | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following)(11)

1	20.402(b)	0	20.405(c)	0	50.73(a)(2)(iv)	0	73.71(b)
0	20.405(a)(1)(i)	0	50.36(c)(1)	0	50.73(a)(2)(v)	0	73.71(c)
0	20.405(a)(1)(ii)	0	50.36(c)(2)	0	50.73(a)(2)(vii)	0	OTHER (Specify in
0	20.405(a)(1)(iii)	XX	50.73(a)(2)(i)	0	50.73(a)(2)(viii)(A)	Abstract below and in	
0	20.405(a)(1)(iv)	0	50.73(a)(2)(ii)	0	50.73(a)(2)(viii)(B)	Text, NRC Form 366A)	
0	20.405(a)(1)(v)	0	50.73(a)(2)(iii)	0	50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
Jan Bajraszewski, Compliance Licensing	615843-7749

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) | X | NO | EXPECTED SUBMISSION DATE (15)

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 20, 1992, at approximately 1530 Eastern standard time (EST), with Units 1 and 2 in power operation at approximately 100 percent power, it was discovered that the surveillance requirement for verification of containment integrity was not performed properly. The position of ten manual drain and test connection valves in each unit was not verified. The surveillance instruction (SI) steps were waived by the performers when the units were at power because of potential industrial safety concerns. The event was discovered during review of a procedure revision request to waive inspection of two valves when the units are at power. A review of the applicable SI data packages indicated that the SI had been improperly performed at power since May 17, 1990, when a note was added indicating that some valves may be inaccessible at power. Upon discovery of the event, Limiting Condition for Operation (LCO) 3.6.1.1 was entered. The cause of the event is considered to be inappropriate waiver of SI steps as a result of an inadequate procedure. A special SI was performed for inspection of the valves that were waived. These valves were found in the closed position as required, and LCO 3.6.1.1 was exited. The procedure note was revised to clearly communicate the potential safety hazard where these valves are located and that the note does not imply that inspection can be waived.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	NUMBER	REVISION NUMBER	OF	PAGES
Sequoyah Nuclear Plant, Unit 1	050032792	0	2	1	0	0

TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. PLANT CONDITIONS

Units 1 and 2 were in power operation at approximately 100 percent power.

II. DESCRIPTION OF EVENT

A. Event

On November 20, 1992, at approximately 1530 Eastern standard time (EST), it was discovered that the surveillance requirement for verification of containment integrity (EIIS Code JM) was not performed properly. The position of ten manual drain and test connection valves (EIIS Code TV) in the main steam valve vaults of each unit were not verified. The valves are in the outboard portion of the containment isolation boundary on the main steam (EIIS Code SB) and feedwater (EIIS Code SJ) systems. The surveillance instruction (SI) steps for these valves were waived by the SI performers when the units were at power. Applicable SI data packages were reviewed, and it was determined that the SI has been improperly performed at power since May 17, 1990. The SIs were revised at that time add a note indicating that some valves may be inaccessible at power. However, before going to Mode 4 after a refueling outage or shutdown on either unit, the valves were verified to be closed. Upon discovery of the event, Limiting Condition for Operation (LCO) 3.6.1.1 was entered. A special SI was performed for inspection of the valves that were waived on each unit. These valves were found in the closed position, as required, and LCO 3.6.1.1 was exited.

B. Inoperable Structures, Components, or Systems That Contributed to the Event

None.

C. Dates and Approximate Times of Major Occurrences

May 17, 1990	An SI for valve position verification was revised; a note was added identifying specific valves that may be inaccessible at power because of high temperature or possible steam blow back.
October 17, 1992	An assistant shift operations supervisor reviewed a Unit 2 performance of the SI and requested a procedure revision. The request was for the addition of two valves to those already identified as potentially inaccessible.

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Sequoyah Nuclear Plant, Unit 1	050032792	--	021	--	0	0	3 OF 5

TEXT (If more space is required, use additional NRC Form 366: s) (17)

November 20, 1992 at approximately 1530 EST During review of the procedure revision request, it was determined that no basis existed for excluding the valves from containment integrity verification inspection. Past SI performances were reviewed, and improper performance of the SI was identified.

November 20, 1992 at 1533 EST Operations entered LCO 3.6.1.1 for each unit, and a special SI was requested to inspect the valves that were waived.

November 20, 1992 at 1907 EST The special SI was completed for Unit 1; the valves were found closed. Operations exited LCO 3.6.1.1 for Unit 1.

November 20, 1992 at 2252 EST The special SI was completed for Unit 2; the valves were found closed. Operations exited LCO 3.6.1.1 for Unit 2.

D. Other Systems or Secondary Functions Affected

None.

E. Method of Discovery

The event was discovered during review of a procedure revision request for the addition of two valves for waiver of inspection. It was determined that no basis existed for excluding the valves from containment integrity verification. Past SI performances were reviewed, and improper performance was identified.

F. Operator Actions

Operations personnel entered LCO 3.6.1.1 and took appropriate action to ensure containment integrity.

G. Safety System Responses

Not applicable - no safety system responses were required.

III. CAUSE OF EVENT

A. Immediate Cause

The immediate cause of the event is a result of inappropriate waiver of SI steps as a result of an inadequate procedure. The steps were waived by the SI performers because a note in the SI was interpreted as permission to waive the inspection when the units were at power.

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Sequoyah Nuclear Plant, Unit 1		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		05	03	2	7	9	2

TEXT (If more space is required, use additional NRC Form 366A's) (17)

B. Root Cause

The root cause of this event is attributed to an inadequate procedure. The note in the SI stating that the valve may be inaccessible at power was ambiguous. The note was added to the SI as a caution of potential health and safety hazards in the area where the valves are located. This was intended to alert the performer to take appropriate safety precautions during performance of the SI in those locations.

C. Contributing Factors

Misunderstanding of the requirements for procedure step waiver and technical specification application relative to vent, drain, and test connection valves required for containment isolation verification, lead the reviewers of the completed SI data packages to believe waiver of inspection for these valves was allowed. As a result, the event was not identified during routine review of the SI data packages.

IV. ANALYSIS OF EVENT

Containment integrity ensures confinement of radioactive material inside the containment vessel. The valves in this event were verified to be in the isolated (closed) position before power ascension (after a refueling outage or shutdown) of each unit. Also, when the valves were inspected upon discovery of the improper SI performances, the valves were found in the normal configuration position (closed). Configuration control processes ensure that if a valve position is off-normal, it is returned to normal configuration following the evolution requiring the position change. Nothing exists to indicate that containment integrity was not maintained. For these reasons, this event did not adversely affect the health and safety of the public.

V. CORRECTIVE ACTIONS

A. Immediate Corrective Actions

The valves that were waived in the SI performance were inspected. The procedure note was revised to clearly communicate the potential industrial safety hazard at the valve locations and that the note does not imply that inspection can be waived.

B. Corrective Action to Prevent Recurrence

The proper use of procedure step waiver will be communicated to personnel that perform SI data package review.

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TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Sequoyah Nuclear Plant, Unit 1							
	05003279	2	1	0	0	0	5 OF 5

TEXT (If more space is required, use additional NRC Form 366A's) (17)

The procedure that provides guidance for waiver of a procedure step will be revised to clarify requirements for procedure step waiver.

The procedures reviewed for LER 327/92003 for provisions to waive requirements with the units at power will be re-reviewed to ensure that ambiguity that could be interpreted to allow waiver of procedure steps has been properly identified and resolved.

VI. ADDITIONAL INFORMATION

A. Failed Components

None.

B. Previous Similar Events

A review of previous events identified LER 327/92003 as an event where the inspection of fire protection valves inside containment was waived. In that event, the root cause was determined to be a deficient procedure because valve position verification was not required in containment during operation. Therefore, the inspection of the fire protection valves was waived during performance of the procedure. The action taken as a result of that event was to review other SIs for provisions to waive requirements with the unit at power to ensure that compliance is maintained. The review identified the procedure containing the note. However, because the reviewer did not clearly understand technical specification requirements for the valves in question, the procedure note and waiver of inspection at power was thought to be acceptable. The action taken previously should have identified the event described in this LER.

VII. COMMITMENTS

1. The proper use of procedure step waiver will be communicated by January 22, 1993, to personnel that perform SI data package review.
2. The procedure that provides guidance for waiver of a procedure step will be revised by March 22, 1993, to clarify requirements for procedure step waiver.
3. The procedures reviewed for LER 327/92003 for provisions to waive requirements with the units at power will be re-reviewed by March 22, 1993, to ensure that ambiguity that could be interpreted to allow waiver of procedure steps has been properly identified and resolved.