

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Sequoyah, Unit 1</b>	DOCKET NUMBER (2) <b>0 5 0 0 0 3 2 7 1</b>	PAGE (3) <b>OF 0 3</b>
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**Essential Raw Cooling Water Radiation Monitor Was Declared Inoperable Without Complying With The Limiting Condition For Operation As A Result of Misinterpretation Of The LCO**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
01	05	88	88	002	00	01	29	88	Sequoyah, Unit 2		0 5 0 0 0 3 2 8
											0 5 0 0 0

OPERATING MODE (9) <b>5</b>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)									
POWER LEVEL (10) <b>0 0 0</b>	<input type="checkbox"/> 20.402(e)	<input type="checkbox"/> 20.405(e)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)						
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)						
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 365A)						
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)							
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)								

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME	ARTA CODE		
<b>B. E. Kilgore, Plant Operations Review Staff</b>	<b>6 1 5</b>	<b>8 7 0</b>	<b>7 0 8 7</b>

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO				

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

On January 5, 1988, with units 1 and 2 in mode 5 (0 percent power, 4 psig, 120 degrees F and 0 percent power, 100 psig, 128 degrees F, respectively), at approximately 1730 EST it was discovered that a Limiting Condition for Operation (LCO) was not complied with as required by Sequoyah Nuclear Plant (SQN) technical specifications (TSs). On January 4, 1988, at approximately 1630 EST Operations personnel declared Radiation Monitors (RMs) 0-RM-90-134 and 0-RM-90-141 inoperable, however, Operations personnel did not comply with action statement 32 of LCO 3.3.3.9 for an interval of approximately 13 hours.

An investigation into this event concluded that a sufficient description to determine the minimum channels of monitoring required to ensure compliance for the LCO did not exist. This resulted in Operations personnel incorrectly interpreting the requirements for compliance of the LCO. As a result, the action of the LCO was not entered.

As immediate corrective action upon discovery of the noncompliance, Operations notified Chemistry to initiate the LCO action statement. To prevent recurrence a TS interpretation is being issued to state that one channel for each ERCW effluent line discharge header is required to be operable during release through these path ways. A memorandum was sent to Operations personnel to inform them of this interpretation. A TS change will be submitted to reflect that a minimum of one RM channel for each ERCW effluent discharge header is required. A review was done of other effluent RMs LCOs, as well as other instrumentation LCOs, to determine if the potential existed for other misinterpretation of minimum channels operable requirement. No similar situations were noted.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

DESCRIPTION OF EVENTS

On January 5, 1988, with units 1 and 2 in mode 5 (0 percent power, 4 psig, 120 degrees F and 0 percent power, 100 psig, 128 degrees F, respectively), at approximately 1730 EST it was discovered that Limiting Condition for Operation (LCO) 3.3.3.9 (Radioactive Effluent Monitoring Instrumentation) was not complied with as required by Sequoyah Nuclear Plant (SQN) Technical Specifications (TSS). The noncompliance resulted from an incorrect interpretation of the minimum channels of radiation monitoring required for the ERCW effluent lines.

On January 4, 1988, at approximately 1633 EST Operations personnel declared Radiation Monitors (RMs) (EIIIS Code IL) 0-RM-90-134 and 0-RM-90-141 inoperable. These RMs monitor the essential raw cooling water (ERCW) (EIIIS Code BI) "B" train discharge header. RM 0-RM-90-134 was declared inoperable when its power supply was declared inoperable as a result of work being performed on 2-RM-90-112 (unit 2 upper containment) which shares the common supply. RM 0-RM-90-141 shares a common instrument malfunction alarm with 0-RM-90-134. 0-RM-90-141 was declared inoperable as the common instrument malfunction alarm was nonfunctional. As a result, both "B" train RMs (134/141) were declared inoperable, however, Operations personnel did not comply with the action of LCO 3.3.3.9 (action statement 32) which requires for sampling of the ERCW effluent line discharge header at a 12-hour interval.

The duration of the interval for which the LCO was not complied with was approximately 13 hours. On January 5, 1988, at approximately 1255 EST "A" train RMs 0-RM-90-133 and 0-RM-90-140 experienced a low flow condition. These RMs are located at the ERCW effluent line "A" train discharge header. Operations at this time entered the LCO action statement for the "A" train header. On January 5, 1988, at approximately 1730, Operations personnel discovered the noncompliance with the LCO action statement on "B" train header for the event which occurred on January 4, 1988. On January 5, 1988, at approximately 1730 EST the LCO for the "B" train was complied with as Operations notified Chemistry personnel, and the action statement was implemented to initiate sampling.

CAUSE OF EVENT

An incorrect interpretation of LCO 3.3.3.9, "Radioactive Effluent Monitoring Instrumentation," was made when the RMs for the "B" header was removed from service. The LCO description provides a table (Table 3.3-12) which lists the minimum channels required to be operable for the ERCW effluent line. The table requires (in the minimum channels operable column) one channel to be operable for the ERCW effluent line. The ERCW effluent line consists of an "A" train and a "B" train discharge header on which RMs 0-RM-90-133/0-RM-90-140 (A train) and 0-RM-90-134/0-RM-90-141 (B train) are located.

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

When the "B" train RMs were declared inoperable on January 4, 1988, the operators determined that the operable status of the "A" train RMs met the minimum required channel criteria as required by the LCO. As a result of this interpretation, the LCO action was not met and for a duration of approximately 13 hours.

The investigation into this event concluded that a sufficient description to determine the minimum channels of monitoring required to ensure compliance for the LCO did not exist. This description is located in the minimum channels operable column in the LCO table, (Table 3.3-12). This resulted in Operations personnel incorrectly interpreting the requirements for compliance of the LCO.

ANALYSIS OF EVENT

This event is reportable under 10 CFR 50.73, paragraph a.2.i.b, as an operation prohibited by the TSs.

There were no safety consequences associated with this event. At 1255 EST and 1730 EST on January 5, 1988, Operations personnel instructed personnel in the Chemistry Laboratory to initiate sampling of the ERCW discharge headers A and B respectively, to determine the gross activity level. At approximately 1750 EST on January 5, 1988, Chemistry personnel completed a gross activity analysis on samples from both the train "A" and train "B" ERCW discharge headers. Both samples contained no detectable activity. Subsequent analysis of grab samples from the ERCW discharge headers, in compliance with action statement 32 to LCO 3.3.3.9, also showed no detectable activity. Based on the results from sampling the "A" train and "B" train ERCW effluent line immediately following the event and the similar plant conditions which existed at the time of the event, TVA believes that there was no release of radioactivity to the environment as a result of this event.

CORRECTIVE ACTION

As immediate corrective action, upon discovery of the noncompliance with the LCO, on January 5, 1988 at approximately 1730 EST, Operations notified Chemistry to initiate the action statement to begin sampling the "B" train. The LCO action was followed until the RMs were returned to service. RMs 0-RM-90-134 and 0-RM-90-141 were returned to service at approximately 1640 EST on January 7, 1988. RMs 0-RM-90-133 and 0-RM-90-140 were returned to service at approximately 0515 EST on January 11, 1988.

A TS interpretation is being issued to state that one channel for each ERCW effluent line discharge header is required to be operable during release through these path ways. A memorandum was sent out to Operations personnel to inform them of this interpretation. A TS change will be submitted to reflect that a minimum of one RM channel for each ERCW effluent discharge header is required. A review was done of other effluent RMs LCOs, as well as other instrumentation LCOs, to determine if the potential existed for other misinterpretation of minimum channels operable requirements. No similar situations were noted.

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TENNESSEE VALLEY AUTHORITY

Sequoyah Nuclear Plant  
Post Office Box 2000  
Soddy-Daisy, Tennessee 37379

January 29, 1988

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 1 - DOCKET NO.  
50-327 - FACILITY OPERATING LICENSE DPR-77 - REPORTABLE OCCURRENCE REPORT  
SQRO-50-327/88002

The enclosed licensee event report provides details concerning an essential raw cooling water radiation monitor which was declared inoperable without complying with the limiting condition for operation as a result of misinterpretation of the LCO. This event is reported in accordance with 10 CFR 50.73, paragraph a.2.i.b.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
S. J. Smith  
Plant Manager

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cc (Enclosure):

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