

ENCLOSURE 1

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

The following violations were identified during an inspection conducted on December 2-6, 1985. The Severity levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, two examples were noted where the licensee failed to promptly correct conditions adverse to quality. Specifically:

- a. A licensee Corrective Action Report (CAR) 4b-82-45 and supplemental responses reported deficiencies in completing engineering and quality assurance reviews of field completed maintenance requests due to their being lost or discarded. Additionally, the supplemental responses committed to disposition of lost or discarded maintenance requests by April 12, 1985. As of December 5, 1985, 670 maintenance requests with field completion dates prior to February 18, 1983, had not completed the engineering and quality assurance review process as a result of failure to complete all required actions of the CAR 4b-82-45. Additionally, as of December 5, 1985, 710 maintenance requests were noted to have been in review following completion of work in excess of 60 days which can contribute to a situation where maintenance requests may inadvertently become lost or discarded.
- b. In June 1983, short-term corrective actions were implemented to resolve, in part, problems with Upper Head Injection (UHI) level switches repeatedly being found out of calibration. These actions, which were taken as an interim measure until suitable replacement level switches could be found, appeared to be effective in demonstrating system operability until June 1984 on Unit 2 and August 1984 on Unit 1 at which time monthly calibration data indicated that the level switches were again repeatedly out of calibration. In spite of this condition, additional interim measures were not established to ensure continuous system operability until level switch replacement could be completed. Engineering authorization was issued for replacement of level switches with a more reliable design in August 1985 and level switches were actually replaced on Unit 1. However, level

8603050023 860218
PDR ADOCK 05000327
G PDR

switch replacement for Unit 2 was not scheduled until the next refueling outage cycle which is approximately six months subsequent to the currently scheduled restart. Scheduled implementation of this long-term corrective action for Unit 2 is not considered appropriate or timely in light of the recurrence of level switch calibration problems and the failure to implement additional interim corrective actions as a result of this recurrence.

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

2. Technical Specification 6.8.1 states that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 recommended that maintenance that can affect the performance of safety related equipment should be performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances, and additionally recommended that the control of maintenance, repair, replacement, and modification work be covered by written procedures.

Contrary to the above, three examples were noted where the licensee failed to properly implement required procedures. Specifically:

- a. During performance of valve rewiring activities on valve 2-FCV-70-134, in accordance with work plan 11853, NUREG-0588, 10 CFR 50.49, Valve Rewiring, an electrical jumper was not removed from the valve as required by the work plan.
- b. 14 Pall Trinity Micro Corporation preventative maintenance recommendations associated with auxiliary air compressor dryers were not taken into consideration during development of the preventative maintenance program as required by Standard Practice Procedure SQM-57, Preventative Maintenance. This resulted in no preventative maintenance being established and implemented for these dryers.
- c. Numerous and sustained housekeeping deficiencies were noted in auxiliary building contaminated areas. This condition reflected that requirements of Standard Practice Procedure SQM-66, Plant Housekeeping, with regard to ensuring clean up of work areas upon completion of maintenance or modification work and with regard to adequate performance of housekeeping checks were not complied with.

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

Tennessee Valley Authority
Sequoyah Units 1 and 2

3

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

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 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.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: February 18, 1986