

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority  
Sequoyah

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on June 6 - July 11, 1988, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. Technical Specifications 3.5.1.2 requires; in part, that with the Upper Head Injection system INOPERABLE restore the system to OPERABLE within one hour or be in at least HOT STANDBY within the next six hours and in HOT SHUTDOWN within the following six hours.

Contrary to the above, on July 9 and 10, 1988, the licensee was in non-compliance with the Action Statement of Technical Specification 3.5.1.2. for over 17 hours when existing data reflected inoperability of the hydraulic accumulator for Upper Head Injection system isolation valve 2-87-21. This hydraulic accumulator is attendant auxiliary equipment for the Upper Head Injection system which is required for the system to fulfill its safety function.

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

- B. Technical Specification 3.8.1.1 action A requires that with one diesel generator inoperable the operability of the remaining AC sources must be demonstrated by performance of surveillance requirements 4.8.1.1.1.a and 4.8.1.2.a.4 within one hour and at least once per eight hours thereafter.

Contrary to the above, on June 3, 1988 diesel generator 1A-A was inoperable for approximately three hours and the operability of the remaining AC sources was not demonstrated by the performance of surveillance requirements 4.8.1.1.1.a and 4.8.1.2.a.4 within one hour of diesel generator 1A-A being declared inoperable.

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

8810040274 880915  
PDR ADOCK 05000327  
Q PDC

- C. Technical Specification 6.8.1.e states that written procedures shall be established, implemented and maintained covering site Radiological Emergency Plan (REP) implementation.

The Sequoyah Radiological Emergency Plan IP-1, Emergency Plan Classification Logic which implements these requirements, requires that the operators enter a Notification of Unusual Event if the primary system leak rate is greater than that allowed in the Technical Specifications. Sequoyah Radiological Procedure, IP-2, Notification of Unusual Event, requires that the notification of the Operations Duty Specialist be made within 5 minutes after the declaration of the event.

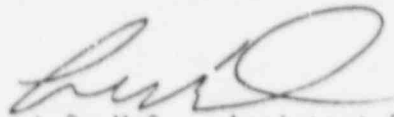
In addition, REP Implementing Procedure IP-1, also states, if there is any reason to doubt whether a given condition has actually occurred, the shift engineer or Site Emergency Director will proceed with the required notification without waiting for formal confirmation.

Contrary to the above, on April 6, 1988 at 7:55 a.m. the licensee entered LCD 3.4.5.2 acknowledging that the RCS leakrate was greater than the TS allowable limits and did not enter a NOUE until 8:20 a.m. when licensee and NRC management reviewed the event. This is a violation of the above requirements.

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 Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Director, Office of Special Projects, and a copy to the NRC Resident Inspector, Sequoyah, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [for each violation]: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION



Frank R. McCoy, Assistant Director  
for TVA Inspection Programs  
TVA Projects Division  
Office of Special Projects

Dated at Atlanta, Georgia  
this 15<sup>th</sup> day of September 1988