



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 03 1988

Docket No. 50-328
License No. DPR-79
EA 88-86

Tennessee Valley Authority
ATTN: Mr. S. A. White
Manager of Nuclear Power
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY
(NRC INSPECTION REPORT NO. 50-328/88-20)

This refers to the special Nuclear Regulatory Commission (NRC) heatup shift coverage inspection conducted by the NRC's Sequoyah Restart Task Force on February 26, 1988 through March 18, 1988. The inspection included a review of the activities associated with the heatup of Sequoyah Unit 2. During the inspection, an NRC inspector identified that while the plant was in Mode 3, one centrifugal charging pump (CCP) was found in the pull-to-lock position. The licensee subsequently determined that both CCPs had been inoperable for a period of one hour and twenty-four minutes in violation of the plant Technical Specifications. At the conclusion of the inspection, the findings were discussed with members of your staff at the NRC Enforcement Conference of March 17, 1988 and the routine NRC exit meeting conducted on March 22, 1988.

Violation I.A described in the enclosed Notice of Violation involves operation of the plant in Mode 3 with both CCPs inoperable. While they were inoperable, safety related equipment needed to perform critical safety functions (i.e. automatic high head safety injection and rapid boron injection) was not automatically available to mitigate inventory loss and main steam line break accidents. The requirement of Technical Specification 3.0.3 to initiate action within one hour to place the unit in a mode in which the specification did not apply was not complied with. Violation I.B described in the enclosed Notice of Violation involves a failure to report this condition pursuant to 10 CFR 50.72. Based on the discussions at the meetings discussed above, as well as through further inspection the NRC staff has concluded that the immediate concerns resulting from these matters have been resolved. Further, the corrective actions outlined by your staff appear to address the longer term concerns that were identified. Violations II.A and B are Severity Level IV violations that were also identified during this inspection.

The NRC recognizes that the amount of core decay heat was minimal since the reactor core had not been critical for approximately two and one-half years and that the reactor coolant system boron concentration was being maintained at the cold shutdown boron concentration (i.e. approximately 2000 ppm). However, if this event had occurred with the reactor at power, the significance would have been much greater. Furthermore, the administrative and personnel errors which caused the event are of concern to the NRC. We are particularly

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concerned that control room personnel had several opportunities, after the problem occurred, to identify and resolve this problem yet the administrative controls established to satisfy Post TMI Action Plan commitments failed to achieve prompt resolution of this problem. This misalignment of the CCP was not identified and corrected during two shift turnovers during which personnel were required to use a control panel checklist designed to verify the correct position of this specific switch as well as other components. We are also concerned that essential control room communications were ineffective. The shift supervisor was not notified of this event until 30 minutes after the misaligned switch was identified to the reactor operator. This notification was accomplished by an NRC inspector. Additionally, unwarranted delays in reporting the event to the NRC resulted in the failure to report the event within four hours after discovery as required by 10 CFR 50.72.

To emphasize the need for diligent attention to detail and to adhere to Technical Specification requirements, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Regional Operations, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Fifty Thousand Dollars (\$50,000) for the violations described in the enclosed Notice.


In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988) (Enforcement Policy), Violations I.A and I.B described in the enclosed Notice have been categorized as a Severity Level III problem. The base value of a civil penalty for a Severity Level III violation or problem is \$50,000. The escalation and mitigation factors in the Enforcement Policy were considered and no mitigation or escalation was deemed appropriate.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and its enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, P.L. 96-511.

Sincerely,


Stewart D. Ebnetter, Director
Office of Special Projects

Enclosures: Notice of Violation and Proposed
Imposition of Civil Penalty

cc: See Next Page

cc w/enclosures:

H. L. Abercrombie, Site Director
Sequoyah Nuclear Plant
J. A. Kirkebo, Director
Nuclear Engineering
R. L. Gridley, Director
Nuclear Safety and Licensing
M. R. Harding, Site Licensing
Manager
TVA Representative, Rockville Office