NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah Nuclear Plant

Docket Nos. 50-327 and 50-328
License Nos. DPR-77 and DPR-79
EA 99-018

During an NRC inspection conducted on November 22, 1998 through January 2, 1999, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

A. Technical Specification 6.8.1.a requires, in part, that procedures shall be established, implemented, and maintained covering activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operations)." Regulatory Guide 1.33 Appendix A, Paragraph 6 recommends procedures for combating emergencies and other significant events.

Emergency Subprocedure (EOP) ES-0.1, Reactor Trip Response, Revision 22, Step 3.c., contains the continuous action requirement "IF temperature greater than 552 F and rising, THEN...DUMP steam USING atmospheric reliefs." Step 3 of the subprocedure foldout page, which presents actions which apply at all times during procedure performance, also contains the requirement to "MONITOR reactor coolant system (RCS) temperatures stable at or trending to between 547° F and 552° F."

EOP ES-0.1, Reactor Trip Response, Revision 22, step 8.b., contains the continuous action requirement "IF pressure greater than 2235 psig and rising, THEN...CONTROL pressure USING one pressurizer power operated relief valve (PORV)." Step 8.b.2 of ES-0.1 foldout page also contains the requirement "(if pressurizer pressure greater than 2235 psig and rising) CONTROL pressure."

Contrary to the above, following a Unit 1 reactor trip on November 9, 1998, the procedural requirements of EOP ES-0.1 were not properly implemented, in that:

1. RCS temperatures were not monitored, stable and trending to between 547° F and 552° F and subsequently steam was not dumped using the atmospheric reliefs when RCS temperature was greater than 552° F and rising. RCS temperatures exceeded 552° F for a period of approximately 23 minutes.

2. RCS pressure was not controlled using one pressurizer PORV when RCS pressure was greater than 2235 psig and rising. RCS pressure exceeded 2235 psig for approximately 25 minutes.

This is a Severity Level IV Violation (Supplement 1).

B. Technical Specification 3.3.1.1 requires that the reactor trip system instrumentation channels and interlocks of Table 3.3.-1 shall be operable. Table 3.3-1, Functional Unit 12, Loss of Flow-Single Loop, requires a minimum of 2 RCS flow channels per loop to be operable in Mode 1.

Technical Specification 3.0.3 requires, in part, that when a Limiting Condition for Operation is not met, except as provided in the associated action requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply.

Contrary to the above, Technical Specification 3.0.3 was not met, in that on November 20, 1998, all three channels of the Unit 1 RCS Loop 1 flow instruments (1-F1-68-6A, 6B & 6D) were inoperable, indicating off-scale high, and TS 3.0.3 was not entered to initiate action to place the unit in a MODE in which the Specification does not apply (Mode 2 or less).

This is a Severity Level IV Violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region , and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 1st day of February 1999