

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on January 6 - February 5, 1987, violations of NRC requirements were identified. The violations involved failures in: adequately controlling field changes; and establishing, maintaining, and implementing safety-related procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

1. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering safety-related activities stated in Appendix A of Regulatory Guide 1.33, Revision 2, including surveillance and test activities of safety-related systems.

- a. Instrument Maintenance Instruction (IMI)-99, Response Test (RT) 106A.2, states that the technician is required to have the operator place the appropriate reactor protection system channel block switch in the "block" position prior to inserting test leads.

Contrary to the above, the technician did not implement the requirements of RT-106A.2 in that he failed to have the appropriate reactor protection system channel block switch in the "block" position prior to inserting test leads. As a result, a containment ventilation isolation (engineered safety feature actuation) occurred when test leads were inserted.

- b. Work plan 12268 included a functional test which was intended to test the operability of switch 2-HS-31A-7A.

Contrary to the above, the functional test in work plan 12268 was inadequate in that it did not include the appropriate lifted leads. When the functional test was performed, it initiated an inadvertent control room isolation (engineered safety feature actuation).

- c. Instrument Maintenance Instruction (IMI)-99, Response Time (RT)-16.7, was established to functionally test containment pressure channel III.

Contrary to the above, RT-16.7 was inadequate, in that it requires only the train being tested be placed in "test" prior to tripping the high-high containment pressure bistables. As a result, an inadvertent containment phase "B" isolation (engineered safety feature actuation) occurred when the test was performed.

- d. General operating instruction GOI-6H, Freeze Protection Checklist, requires the technician to check that all listed circuits are greater than or equal to 75 degrees F and to check thermostats set at 75 degrees F.

Contrary to the above, GOI-6H was performed without verifying the temperatures of circuits as required. In addition, the observed performance did not check all listed thermostats, as required, because they were not found. Finally, circuit thermostats were not set to 75 degrees F per procedure.

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

2. 10CFR50 Appendix B, Criterion III, states that design changes including field changes shall be subject to design control measures commensurate with those applied to the original design. Nuclear Engineering Procedure (NEP)-6.1 states that changes to any design documents which deviate from the approved scope of work will be evaluated against the original work scope. The evaluation against the original work scope includes applicable portions of NEP-6.1, Attachment 2.

Field change 4873 deviated from the approved scope of Engineering Change Notice (ECN) L6715, which implemented the original design change request, by addressing the removal of electrical circuits indicated in "hold clouds" from certain drawings. ECN L6715 did not address the existence or removal of these electrical circuits indicated in "hold clouds" on certain drawings.

Contrary to the above, field change 4873 was not reviewed and approved subject to design control measures commensurate with those applied to the original design in that:

- a. The design change request that initiated the original engineering change notice was not reviewed during the field change review and approval process.
- b. NEP-6.1, Attachment 2 was not used in the field change request review and approval process.

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

Pursuant to 10 CFR 2.201, Tennessee Valley Authority is 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.

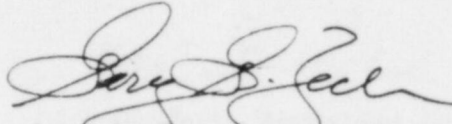
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Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790 (d) or 10 CFR 73.21.

FOR THE NUCLEAR REGULATORY COMMISSION



Gary G. Zech, Assistant Director  
Inspection Programs  
Division of TVA Projects  
Office of Special Projects

Dated at Atlanta, Georgia  
this 17 day of April 1987