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400 psi	s; th	eref	ore, the	partial	AFW	BPLCV	test	was d	conducted	with eac	h SI-118	
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L'S NUCLEAR REQULATORY COMMISSION

EXPIRES 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PACE (3)
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DESCRIPTION OF EVENT

NRC Form 366A

On December 3, 1987, at approximately 0830 EST, it was determined that the auxiliary feedwater (AFW) (EIIS Code BA) bypass level control values (BPLCVs) had not been completely tested during performance of Surveillance Instruction (SI)-118, "Motor Priven Auxiliary Feedwater Pump and Value Automatic Actuation." This inadequacy was initially identified on March 25, 1987, but no LER was submitted. On December 3, 1987, unit 1 and unit 2 were in mode 5 (0 percent power, 4 psig, 124 degrees F and 0 percent power, 120 psig, 113 degrees F, respectively). The procedural deficiencies were discovered during the SI Review Program and documented on Potential Reportable Occurrence (PRO) 1-87-129, initiated on March 25, 1987. The initial evaluation of the PRO resulted in a determination of not reportable based on the evaluation that the intent of the technical specification (TS) was met. However, an audit conducted by an NKC inspector revealed the evaluation was incorrect.

SI-115, Revision 24, was determined to be incomplete because the procedural step (step 2.2 of data sheet 10) used to verify that the BPLCV opens and regulates in automatic to control level near setpoint (33 percent steam generator (S/G) level) is performed only if the procedure is conducted with 5/G pressures less that 400 poig. This condition allowed the possibility of no surveillance testing of the BPLCV if the procedure was performed when S/G pressures were greater than 400 psig. A review of previously performed SI-118 procedures found that all were conducted with S/G pressures less than 400 psig. Additionally, it was found that SI-118 did not test contacts 11, 12 and 13, 14 of relays RA1 and RB1. RA1 and RB1 are train "A" and train "B" relays that are used to initiate closure of the AFW bypass level control valves and switch to automatic control of the main AFW level control valves upon an accident signal 17 the AFW bypass level control valves are in manual mode of operation and S/G pressures are greater than 400 psig.

During evaulation of the March 25, 1987 finding, an investigation was initiated to determine if SI-118 mot TS Surveillance Requirement (SR) 4.7.1.2.b.1 for the AFW BPLCV. TS SR 4.7.2.2.b.1 requires the verification of proper actuation of each automatic AFW valve in the flow path upon receipt of an actuation test signal and a low AFW pump suction pressure test signal. The evaluation concluded that past performances of SI-118 had tested the valves sufficiently to satisfy the intent of SR 4.7.1.2.b.1, and thus, it was determined to be not reportable. SI-118 was revised as a result of this evaluation to clearly define the procedures intent to test the AFW BPLCVs. The March 25, 1987 identification of the procedural deficiency resulted from the Sequoyah SI-1, "Surveiflance Program," Appendix F review program. The SI-1, Appendix F review program is a recent program implemented to ensure the SIs are technically and administratively adaquate.

LICENSEE	EVENT	REPORT	(LER)	TEXT	CONTINUATION
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U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO 3150-0104

EXPIRES: 8/31/88

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CAUSE OF EVENT

NRC*Form 366A

The cause of not completely testing the AFW BPLCVs has been determined to be an incomplete test procedure. The cause of the incomplete test procedure has been determined to be the SI review program in affect at the time SI-118 was written. The root cause was previously recognized and has been corrected by the implementation of the SI Review Program covered under SI-1, Appendix F.

The cause of not recognizing the reportability of this issue was due to a misunderstanding of the necessary steps required to test all operational modes of the AFW BPLCVs. This resulted in the conclusion that the procedure met the SR, and therefore, no LER submittal was necessary.

ANALYSIS OF EVENT

This event is being reported under 20 SFR 50.73, paragraph a.2.1.B, as a condition prohibited by TSs.

Failure to test the values actuation on an accident signal is not considered to have an adverse affect on safety because the control room operator has manual control capability of these values and the AFW main level control values in the main control room.

CORRECTIVE ACTION

As immediate corrective action, a procedure change was initiated to SI-118 to completely test the AFW BPLCVs. This change was approved on April 17, 1987.

The unit 2 AFW BPLCVs will be tested using the revised SI-118 procedure before unit 2 entry into mode 3. The unit 1 AFW BPLCVs will be tested using the revised SI-118 procedure before unit 1 entry into mode 3.

As described above, the SI-1, Appendix F review was implemented to address the root cause of this type of procedure inadequacy. SI-1, Appendix F met its programmatic function by originally identifying SI-118 deficiencies.

The root cause of not meeting the reportability requirements was addressed by a review of this event by the responsible manager with the personnel conducting TS compliance evaluations for reportability. This review was conducted on December 22, 1987.

LICENSES EVENT REPORT (LER) TEXT CONTINUATION													
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TENNESSEE VALLEY AUTHORITY Sequoyah Nuclear Plant Post Office Box 2000 Soddy-Daisy, Tennessee 37379

December 30, 1987

U. S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - DOCKET NOS. 50-327 AND 50-328 - FACILITY OPERATING LICENSE DPR-77 AND DPR-79 -REPORTABLE OCCURRENCE REPORT SQR0-50-327/87075

The enclosed licensee event report provides details concerning a failure to properly identify and report a deficient procedure used to implement technical specification surveillance requirements. This event is reported in accordance with 10 CFR 50.73, paragraph a.2.1.B.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

. Smith

Plant Manager

Enclosure cc (Enclosure):

> J. Nelson Grace, Regional Administrator U. S. Nuclear Regulatory Commission Suite 2900 101 Marietta Street, noncompliance Atlanta, Georgia 30323

Records Center Institute of Nuclear Power Operations Suite 1500 1100 Circle 75 Parkway Atlanta, Georgia 30339

NRC Inspector, Sequoyah Nuclear Plant