

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Sequoyah, Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 2 8	PAGE (3) 1 OF 0 3
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TITLE (4) Operational Mode Change Made Without Exception To Limiting Condition For Operation (LCO) 3.0.4 Due To A Misinterpretation

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)																																																																		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)																																																																
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<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">OPERATING MODE (9)</td> <td style="width:15%;">1</td> <td colspan="10">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)</td> </tr> <tr> <td rowspan="5">POWER LEVEL (10) 1 0 0</td> <td></td> <td>20.402(b)</td> <td></td> <td>20.405(c)</td> <td></td> <td>50.73(a)(2)(iv)</td> <td></td> <td>73.71(b)</td> <td colspan="3" rowspan="5">OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td></td> <td>20.405(a)(1)(i)</td> <td></td> <td>50.36(c)(1)</td> <td></td> <td>50.73(a)(2)(v)</td> <td></td> <td>73.71(c)</td> </tr> <tr> <td></td> <td>20.405(a)(1)(ii)</td> <td></td> <td>50.36(c)(2)</td> <td></td> <td>50.73(a)(2)(vii)</td> <td></td> <td></td> </tr> <tr> <td></td> <td>20.405(a)(1)(iii)</td> <td>X</td> <td>50.73(a)(2)(i)</td> <td></td> <td>50.73(a)(2)(viii)(A)</td> <td></td> <td></td> </tr> <tr> <td></td> <td>20.405(a)(1)(iv)</td> <td></td> <td>50.73(a)(2)(ii)</td> <td></td> <td>50.73(a)(2)(viii)(B)</td> <td></td> <td></td> </tr> <tr> <td></td> <td>20.405(a)(1)(v)</td> <td></td> <td>50.73(a)(2)(iii)</td> <td></td> <td>50.73(a)(2)(x)</td> <td></td> <td></td> </tr> </table>												OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)										POWER LEVEL (10) 1 0 0		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)				20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)		20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)				20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)				20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)				20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		
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LICENSEE CONTACT FOR THIS LER (12)

NAME G. E. Tiner, Plant Reporting Section	TELEPHONE NUMBER 6 1 5 8 4 3 - 6 2 3 2
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (if yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces - i.e. approximately fifteen single space typewritten lines) (16)

On April 16, 1989, at 0040 EDT, unit 2 entered mode 1 with Rod Position Indicator (RPI) H-12 inoperable. RPI H-12 had been declared inoperable and 3.1.3.2 entered at 2240 EDT on April 15, 1989. The action statement for Limiting Condition for Operation (LCO) 3.1.3.2 requires no action if reactor power is below 50 percent. The inoperability of the RPI channel was discussed among the on shift personnel prior to the mode change and it was decided that since no action was required below 50 percent power, they agreed that it would be acceptable to proceed to mode 1. However, LCO 3.0.4 states that entry into an operational mode shall not be made with reliance on the provisions contained in the action requirements, and LCO 3.1.3.2 does not contain an exception to LCO 3.0.4. During troubleshooting of RPI channel H-12 on April 17, 1989, it was discovered that the connector at the vertical panel on the reactor head had failed due to moisture deterioration. The connector was replaced and the channel returned to service at 0630 EDT on April 17, 1989. The personnel involved in the mode change decision failed to fully consider the effects of LCO 3.0.4. As a corrective measure, TVA will issue a training letter by May 23, 1989, on this event to be reviewed by operations personnel to prevent future recurrence.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION OF EVENT

On April 16, 1989, at 0040 EDT, with Unit 1 in Mode 1 (100-percent full power, 2235 psig, and 578 degrees F), and Unit 2 in Mode 2 (4.5 percent power, 2235 psig, and 548.4 degrees F), Unit 2 entered Mode 1 (5 percent power) with Rod Position Indicator (RPI) H-12 (E115 Code AA) inoperable. RPI H-12 had exceeded its allowable tolerance of plus or minus 12 steps at 2240 EDT on April 15, 1989 with Unit 2 in Mode 2, and as a result, was declared inoperable and Limiting Condition for Operation (LCO) 3.1.3.2 entered. The action statement for LCO 3.1.3.2 requires no action if reactor power is below 50 percent. Above 50 percent power the position of the nonindicating rod must be determined using the encore detector system every eight hours, and immediately after any motion of the nonindicating rod which exceeds 24 steps in one direction. The inoperability of the RPI channel was discussed among the on shift personnel including the operations superintendent prior to the mode change and it was decided that since no action was required below 50 percent power, there would not be a problem transitioning from mode 2 to mode 1. However, LCO 3.0.4 states that entry into an operational mode shall not be made with reliance on the provisions contained in the action requirements. Exceptions to LCO 3.0.4 are stated in the individual specifications, and LCO 3.1.3.2 does not contain an exception. Unit 2 subsequently tripped at 0048 EDT on April 16, 1989 due to feed water related problems.

CAUSE OF EVENT

RPI channel H-12 was investigated on April 17, 1989 to determine the cause of failure. It was discovered that the connector at the vertical panel on the reactor head had failed due to moisture deterioration. The connector was replaced and the channel returned to service at 0630 EDT on April 17, 1989. The personnel involved in the decision to determine whether it was acceptable to change modes failed to fully consider the effects of LCO 3.0.4.

ANALYSIS OF EVENT

This event is being reported in accordance with 10 CFR 50.73 paragraph a.2.i as a condition that is prohibited by the Technical Specifications (TS).

The RPI system is described in section 7.7 of the Sequoyah Nuclear Plant FSAR (Control Systems Not Required for Safety). The purpose of the RPI system is to provide a direct, continuous readout of every rod cluster assembly position and is presented to the operator by individual meter indications. A rod bottom alarm light is also provided to indicate when the rod is inserted. For redundant indication, the Demand Position Indication (DPI) system (driven by the Rod Control System) is provided. Both DPI and RPI are separate systems, and each serves as back-up for the other.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Since the DPI system was operable and no action accordance with TS is required below 50 percent power, no adverse safety consequences resulted from this event.

CORRECTIVE ACTIONS

The failed connector located at the vertical panel on the reactor head was replaced and the channel returned to service at 0630 EDT, on April 17, 1989. TVA is currently evaluating the possibility of hard wiring the RPI connectors at the reactor head and using terminal strips and spade lugs instead of connectors at the vertical panel.

To help prevent recurrence of this event, the technical specifications will be reviewed to find LCOs which could be similarly interpreted to that of LCO 3.1.3.2. This information will then be incorporated in a training letter to be issued to Operations personnel by May 24, 1989, to reinforce the requirements of LCO 3.0.4.

ADDITIONAL INFORMATION

There has been one previous report of noncompliance of LCO 3.0.4; SQRO-50-327/84024. This noncompliance was not as a result of a cognitive decision.

COMMITMENTS

To help prevent recurrence of this event, the technical specifications will be reviewed to find LCOs which could be similarly interpreted to that of LCO 3.1.3.2. This information will then be incorporated in a training letter to be issued to Operations personnel by May 24, 1989, to reinforce the requirements of LCO 3.0.4.

0439Q

TENNESSEE VALLEY AUTHORITY
Chattanooga, Tennessee 37401

6N 38A Lookout Place

May 15, 1989

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

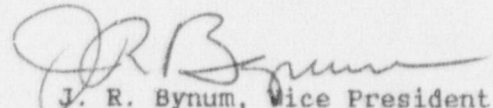
Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 1 - DOCKET NO.
50-328 - FACILITY OPERATING LICENSE DPR-79 - LICENSEE EVENT REPORT (LER)
50-328/89004

The enclosed licensee event report provides details concerning an operational mode change made without exception to limiting condition for operation (LCO) 3.0.4 due to a misinterpretation. This event is reported in accordance with 10 CFR 50.73, paragraph a.2.i.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


J. R. Bynum, Vice President
Nuclear Power Production

Enclosure

cc (Enclosure):

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

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

Sequoyah Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy-Daisy, Tennessee 37379

