

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

1750 Chestnut Street Tower II

May 26, 1981

Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303



Dear Mr. O'Reilly:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 1 - DOCKET NO.
50-327 - FACILITY OPERATING LICENSE DPR-77 - REPORTABLE OCCURRENCE REPORT
SQRO-50-327/81028, REVISION 1

This is a supplement to my letter dated March 24, 1981. The enclosed report provides details concerning the failure of the waste gas analyzer's oxygen cell due to moisture condensation and failure to analyze grab samples within the required 4-hour time limit.

This event was originally reported as a 30-day report under 6.9.1.13.b of Sequoyah unit 1 technical specifications, but subsequent review of the event has determined that the event should have been reported under 6.9.1.12.b, which requires a 14-day report. This revision is submitted to change the LER occurrence code and report type. In addition, following is a synopsis of the event's evaluation and the corrective action taken to prevent future occurrences of incorrect evaluations.

On February 24, 1981, Potential Reportable Occurrence (PRO) 1-81-045 reported the waste gas disposal oxygen analyzer inoperable. This placed the unit under action statement 43 of limiting condition for operation 3.3.3.10, which requires grab samples to be taken once every 4 hours and analyzed within the following 4 hours. On February 26, 1981, PRO 1-81-047 reported that both gas chromatographs were out of service for the first 12 hours after the analyzer was declared inoperable; therefore samples taken early during the period of analyzer operability were not analyzed within the 4-hour time requirement.

The shift engineer, who is required to make an initial evaluation of the PRO for prompt or immediate notifications, determined the PRO to be routinely reportable (30-day LER), but not as a prompt report (14-day LER). The plant Compliance Staff forwarded the PRO to the plant cognizant section without performing an evaluation. The cognizant section evaluation of the PRO determined that the event was not reportable. After the PRO was returned to the Compliance Staff, deliberation determined that the PRO should be reported as a 30-day report combined with PRO 1-81-045.

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Mr. James P. O'Reilly, Director

After the LER was submitted to NRC, a central office review of the LER determined that the event should have been reported under 6.9.1.12.b in lieu of 6.9.1.13.b and that the LER should have been a 14-day report. This fact was brought to the attention of the plant Compliance Staff, which has concurred with the central office determination.

The plant superintendent has issued a memo to the assistant plant superintendents on the importance of proper evaluation regarding the reportability of potential reportable occurrences. The initial evaluation by the shift engineer was stressed, since this first evaluation could sway the evaluations made during subsequent reviews. The Compliance Staff is revising the appropriate procedures to include a preliminary evaluation for reportability by the Compliance Staff following the shift engineer's evaluation and before forwarding of the PRO to the cognizant section.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

H. J. Green
Director of Nuclear Power

Enclosure

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