

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

August 10, 1981

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

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/81-22, 50-328/81-22 - RESPONSE TO VIOLATIONS

The subject inspection report dated June 9, 1981 cited TVA with two  
Severity Level IV Violations in accordance with 10 CFR 2.201. Enclosed  
is our response as discussed with Inspector P. Burnett on August 4 and  
August 7, 1981.

If you have any questions, please get in touch with D. L. Lambert at  
FTS 857-2581.

To the best of my knowledge, I declare the statements contained herein are  
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*  
L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Director (Enclosure)  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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ENCLOSURE

SEQUOYAH NUCLEAR PLANT UNIT 1  
RESPONSE TO VIOLATIONS

Violation 50-327/81-22-01

10 CFR 50, Appendix B, Criterion V, and Section 17.2.5 of the accepted QA program require that procedures and instructions prescribing operational activities that affect safety-related functions provide applicable quantitative and qualitative acceptance criteria. Section 4.5 of Part II of the Operational Quality Assurance Manual requires that acceptance criteria shall be included in the surveillance instruction, and test or inspection data shall be compared with these criteria as a basis for acceptance or rejection.

Contrary to the above, instructions prescribing operational activities that affect safety-related functions did not provide applicable quantitative and qualitative acceptance criteria in that surveillance instruction SI-2 did not include quantitative and qualitative acceptance criteria. Consequently, pressurizer level channel LI-68-339A was inoperable on April 2, 1981, but was not placed into trip, as required by Technical Specification 3.3.1.1, until the inoperable condition was identified by an NRC inspector.

This is a Severity Level IV Violation (Supplement I.F).

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reasons for the Violation if Admitted

When SI-2 was prepared, the need for acceptance criteria for channel checks was overlooked and therefore was not included in the instruction. With respect to this specific incident, it should be noted that the pressurizer level channel LI-68-339A drifted high which is conservative since the only reactor protection signal from pressurizer level is from a high level trip. Shift operating employees were aware of the offset. The channel would have performed its intended safety function and was therefore never actually inoperable.

Corrective Steps Which Have Been Taken and Results Achieved

The pressurizer level channel LI-68-339A was declared inoperable and the associated bistable tripped on April 2, 1981.

A change to SI-2 was put into effect on April 6, 1981 to establish acceptance criteria for the pressurizer level instrument channel checks.

The problems with the pressurizer channel were further investigated. It was discovered that a tubing error had prevented proper operation of the condensate pot which had resulted in incorrect level indications. The tubing error was corrected on May 13-14, 1981.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Plans have been established to initiate a review of all SI's which contain channel comparisons and/or checks. Through this review, TVA will evaluate the SI's for the need for acceptance criteria; and as determined appropriate, the acceptance criteria will be incorporated.

Date When Full Compliance Will Be Achieved

TVA has been in full compliance since April 6, 1981 when the modifications to SI-2 were put into effect. Additionally, the above-mentioned review (and incorporation of acceptance criteria, if necessary) of all SI's which contain channel comparisons and/or checks will be completed by September 15, 1981.

#### Violation 50-327/81-22-02

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with instructions. Section 17.2.3 of the accepted QA program requires that instructions shall be implemented to assure that modifications meet quality assurance standard at least equal to those of the original installation. The safety evaluation for workplan 9117 which recalibrated pressurizer level channel LT-68-339 included special requirement 2 which required that the level indication of channel 68-339 to be compared once per shift to the other two level channels (335 and 320) to confirm that the relationship was unchanged.

Contrary to the above, the safety evaluation was inadequate in that it assumed without confirmation that adequate, quantified surveillance instructions existed when in fact they did not.

This is a Severity Level IV Violation (Supplement I.F).

#### Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

#### Reasons for the Violation if Admitted

The unreviewed safety question determination (USQD), i.e., safety evaluation, correctly stated the special condition to be observed in connection with this temporary change. The violation occurred as stated, however, in that the Plant Operations Review Committee (PORC) in their review of workplan 9117 assumed that SI-2 was adequate to assure full implementation of special requirements of the USQD when in fact it was not.

SI-2 had previously been reviewed and approved by PORC. It had been successfully used for this same activity in the past. PORC did not assure when SI-2 was first approved that it contained adequate acceptance criteria. On this particular occasion, PORC believed that the special condition would be adequately implemented since an approved instruction was to be used.

#### Corrective Steps Which Have Been Taken and Results Achieved

The pressurizer level channel LI-68-339A was declared inoperable and the associated bistable tripped on April 2, 1981. A change to SI-2 was put into effect on April 6, 1981, to establish acceptance criteria for the pressurizer level instrument channel checks.

#### Corrective Steps Which Will Be Taken To Avoid Further Violations

This occurrence will be discussed with PORC members by August 31, 1981. Members will be reminded of the importance of fully assuring that work instructions implement USQD requirements.

Plant instruction AI-19 will be revised by September 15, 1981 to require PORC to assure that USQD special requirements are delineated in the workplan.

#### Date When Full Compliance Will Be Achieved

We will be in full compliance by September 15, 1981.