

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

USNRC REGION II
ATLANTA, GEORGIA

March 25, 1983

83 MAR 28 All: 05

U.S. Nuclear Regulatory Commission
Region II

Attn: Mr. James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/83-01 AND 50-328/83-01 - RESPONSE TO VIOLATION

The subject OIE inspection report dated February 25, 1983 from R. C. Lewis
to H. G. Parris cited TVA with one Severity Level IV Violation.

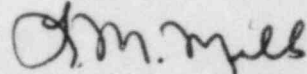
Enclosed is our response to the subject inspection report.

If you have any questions, please get in touch with R. H. Shell at
FTS 858-2688.

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, Manager
Nuclear Licensing

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

8304110735 830405
PDR ADOCK 05000327
Q PDR

ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.
50-327/83-01 AND 50-328/83-01
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED FEBRUARY 25, 1983

327, 328/83-01-01

Technical Specification 3.3.3.9, Table 3.3-12, 2.a requires that a minimum of one radioactive liquid effluent monitoring instrument shall be operable at all times for each Essential Raw Cooling Water line with its alarm/trip setpoint set to ensure that the limits of Specification 3.11.1.1 are not exceeded. With no monitors operable, discharges may continue for up to 30 days provided grab samples are analyzed at least once per 8 hours for gross radioactive gamma.

Contrary to the above, the "A" train Essential Raw Cooling Water effluent monitors were inoperable from December 7, 1982 until January 24, 1983 and grab samples were not analyzed once per 8 hours for gross radioactive gamma. Radiation monitors 0-RM-90-133A and 140A were reading approximately 1.0E03 counts per minute (CPM) due to high background radiation from a nearby Refueling Water Storage Tank (RWST) pipe. The background radiation caused the monitors to alarm continuously and any radioactivity released through the effluent pathway could not cause the monitor to alarm and alert the operators. The monitors were not declared inoperable and 8-hour grab samples were not initiated. This violation applies to both Units 1 and 2.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

On December 7, 1982, the monitor high radiation alarm was received and a grab sampling was initiated. No activity was found; however, background radiation to the monitor had caused the monitor to stay in high alarm. All monitor functions were verified to be working properly except that the alarm would not clear due to the background readings.

The failure to continue the requirements of the action statement was caused by an inadequate surveillance instruction (SI) which did not require the absence of alarms to prove operability of the monitor.

Since the SI did not rely on the absence of alarms to prove operability and the monitor responded to daily channel checks, the monitor was not declared inoperable.

A contributing cause was that the technical specification limiting conditions for operation (LCO) was interpreted to mean that a proper monitor setpoint was all that was required.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Upon identification of the occurrence on January 24, 1983, the requirements of the action statement were complied with. An evaluation was made of the nature of the background radiation and the alarm setpoint. The alarm was cleared by adjusting the setpoint which includes the background radiation.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

A review was made of the technical specification LCO bases and an interpretation has been made to require operations personnel to clear the alarm from the monitor as quickly as possible. Otherwise, the monitor is to be declared inoperable and the action statement complied with. The SI has been revised to reflect these guidelines for verifying operability.

In addition to the instruction revision, a Design Change Request (DCR) has been issued (DCR 1856) to evaluate the possibility of moving the ERCW radiation monitors to an area less susceptible to background radiation.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 9, 1983.