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J. L. Wilson
Vice President, Sequoyah Nuclear Plant

February 18, 1992

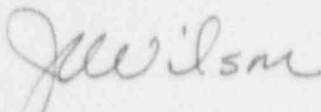
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNIT 1 - DOCKET
NO. 50-327 - FACILITY OPERATING LICENSE DPR-77 - LICENSEE EVENT REPORT
(LER) 50-327/92001

The enclosed LER provides details concerning the failure to perform a technical specification (TS) surveillance requirement for diesel generator sequence timers within the specified time interval. This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation prohibited by TSs.

Sincerely,


J. L. Wilson

Enclosure
cc: See page 2

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cc (Enclosure):

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Sequoyah Nuclear Plant, Unit 1 DOCKET NUMBER (2) 015010131217110F PAGE (3) 015

TITLE (4) Failure to Perform a Surveillance Requirement Because of Procedural Inadequacies

EVENT DAY (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)		
01	17	1992	001	001	01	17	1992	Sequoyah, Unit 2	015010131218		

OPERATING MODE (9) 1 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following)(11)

<u>20.402(b)</u>	<u>20.405(c)</u>	<u>50.73(a)(2)(iv)</u>	<u>73.71(b)</u>
<u>20.405(a)(1)(i)</u>	<u>50.36(c)(1)</u>	<u>50.73(a)(2)(v)</u>	<u>73.71(c)</u>
<u>20.405(a)(1)(ii)</u>	<u>50.36(c)(2)</u>	<u>50.73(a)(2)(vi)</u>	<u>OTHER (Specify in</u>
<u>20.405(a)(1)(iii)</u>	<u>XX 50.73(a)(2)(i)</u>	<u>50.73(a)(2)(viii)(A)</u>	<u>Abstract below and in</u>
<u>20.405(a)(1)(iv)</u>	<u>50.73(a)(2)(ii)</u>	<u>50.73(a)(2)(viii)(B)</u>	<u>Text, NRC Form 366A)</u>
<u>20.405(a)(1)(v)</u>	<u>50.73(a)(2)(iii)</u>	<u>50.73(a)(2)(x)</u>	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
<u>Melissa Meade, Compliance Licensing</u>	<u>615843-7766</u>

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS

SUPPLEMENTAL REPORT EXPECTED (14)

EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<u>YES (If yes, complete EXPECTED SUBMISSION DATE)</u>	<u>X</u>	<u>NO</u>	

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

On January 17, 1992, at 0800, TVA determined that the 2B-B diesel generator load sequence timer associated with the B train electric board room air handling unit had not been calibrated within the frequency required by technical specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.d.10. On January 17, the timer was subsequently found to be within tolerance. On March 8, 1991, the timer surveillance instruction (SI) was revised to include calibration of these sequence timers. The revision was not reviewed by the periodic test coordinator as intended by the standard governing procedure revisions because this intent was not clearly conveyed; therefore, the scheduling mechanism for ensuring that SRs are performed was bypassed. Additionally, work requests (WRs) written to calibrate the timers within frequency were not coordinated with the Periodic Test section. The site standard governing WRs was found to not require this coordination. Corrective action includes revising the site standards governing control of site procedures and WRs to adequately convey the intent of the periodic test coordinator's review of procedures, and to ensure the WRs satisfying SRs are coordinated with the Periodic Test section.

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TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)				PAGE (3)			
		YEAR	NUMBER	REVISION	NUMBER				
Sequoyah Nuclear Plant Unit 1	105101013 12 17 19 12	--	0 0 1	--	0 0	012	OF	015	

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

I. Plant Conditions

Units 1 and 2 were in power operation at approximately 100 percent reactor thermal power.

II. Description of Event

A. Event:

On January 17, 1992, at 0800, TVA determined that the 2B-B diesel generator load sequence enabling timer associated with the B train electric board room air handling unit had not been calibrated within the 18-month frequency required by TS SR 4.8.1.1.2.d.10.

B. Inoperable Structures, Components, or Systems that Contributed to the Event:

None.

C. Dates and Times of Major Occurrences:

February 2, 1990 B train electric board room air handling unit sequence timer replaced and calibrated during a modification. The timer was not considered a TS device and was not placed in the surveillance program to ensure compliance with SR 4.8.1.1.2.d.10.

January 15, 1991 A condition adverse to quality report was initiated stating that the electric board room air handling unit sequence timers, among others, are TS required timers and should be in the surveillance program.

February 14, 1991 LER 50-327/91001 was issued to report this condition. Corrective action included adding this timer to the surveillance program.

March 8, 1991 The timer SI was revised to include calibrating the electric board room air handling units' sequence timers. The revision was not reviewed by the periodic test coordinator as intended by the standard governing procedure revisions.

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

March 12, 1991

Maintenance personnel realized that the calibration interval would be exceeded by waiting until the next regularly scheduled performance of the SI, during the Unit 2 Cycle 5 (U2C5) refueling outage, and initiated a (WR) to calibrate the timer. The WR said that: the timer was last calibrated on February 2, 1990, by a workplan. The SI to calibrate the timer is not scheduled until U2C5. The 18-month calibration interval is up on August 2, 1991. Calibrate the timer for electrical board room air handling unit B on or before August 2, 1991.

August 22, 1991

During a schedule review, the WR to calibrate the timer was removed from the schedule, apparently because replacement timers were not verified to be available. The TS requirement was not recognized during this review.

January 16, 1992

While conducting a review of open WRs, the need and urgency for this WR was questioned.

January 17, 1992

Work Control and Maintenance personnel determined that the timer calibration was required by TSs and was beyond the TS required surveillance interval. The timer was then calibrated and found to be within tolerance.

D. Other Systems or Secondary Functions Affected:

None.

E. Method of Discovery:

The need and urgency of the WR that was initiated to perform the required calibration was questioned while conducting a review of open WRs.

F. Operator Actions:

When informed of the condition, the operators removed the fuses from the control circuit to ensure that an air handling unit start would not overload the diesel.

G. Safety System Responses:

Not applicable - no safety system responses were required.

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TEXT CONTINUATION

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Sequoyah Nuclear Plant Unit 1		YEAR		SEQUENTIAL	REVISION								
		NUMBER		NUMBER									
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

III. Cause of the Event

A. Immediate Cause:

The requirement to calibrate the timer before the surveillance interval expired was not tracked by the surveillance program. This program contains stringent scheduling controls for TS required surveillances.

B. Root Cause:

The root cause of this event is a weakness in the site standard governing WRs. There are no requirements for the initiator of a WR intended to satisfy TS surveillances to ensure that these WRs are registered in the surveillance program so that they are appropriately tracked.

C. Contributing Factors:

A contributing cause to this event is considered to be that the requirements contained in the standard governing control of site procedures relative to reviews of revisions by the Periodic Test coordinator are weak. The intent of the review by the Periodic Test coordinator is to ensure that the surveillance program scheduling is adequately maintained and updated; however, requirements in the standard do not adequately convey this intent. Had the Periodic Test coordinator reviewed the revision, a schedule date for the new equipment being added would have been generated.

IV. Analysis of the Event

The timer was found to be within tolerance when calibrated; therefore, if called upon, it would have performed its intended function and the diesel generator would not have been overloaded. Therefore, this event did not have an adverse effect on the health and safety of the public.

V. Corrective Actions

A. Immediate Corrective Actions:

The operators removed the fuses from the timer circuit. The sequence timer was calibrated, found to be within tolerance, and returned to service.

B. Corrective Actions to Prevent Recurrence:

1. The site standard governing WRs will be revised to require the initiator of WRs generated to satisfy SRs to coordinate with the Periodic Test section.

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		YEAR	NUMBER	NUMBER					
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2. The site standard governing control of procedures will be revised to convey the intent of the periodic test coordinator's review of procedures.
3. Weaknesses in the WR database that have been identified are being evaluated and corrected.
4. A review of WRs will be conducted to ensure that TS required actions are not tracked solely by this system.

VI. Additional Information

A. Failed Components:

None

B. Previous Similar Events:

As described in the description of event, a previous event involving this sequence timer was reported in LER 50-327/91001. Corrective actions resulting from the 1991 event were expected to prevent recurrence.

LFERs 50-327/90007 and 50-327/90029 reported failing to perform SRs involving scheduling problems. 50-327/90007 concerned performance of a surveillance on one train and omitting the other; 50-327/90029 concerned a failure to properly ensure continued performance of an SI following shift change. Corrective actions for these events could not be expected to have precluded this occurrence.

VII. Commitments

1. The site standard governing WRs will be revised by May 8, 1992, to require the initiator of WRs generated to satisfy SRs to coordinate with the Periodic Test section.
2. The site standard governing control of procedures will be revised by April 8, 1992, to adequately convey the intent of the Periodic Test coordinator's review of procedures.
3. A review of WRs will be conducted by February 21, 1992, to ensure that TS required actions are not tracked solely by this system.