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J. L. Wilson  
Vice President, Sequoyah Nuclear Plant

September 18, 1992

U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

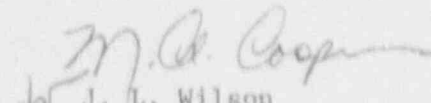
Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 -  
DOCKET NOS. 50-327, 328 - FACILITY OPERATING LICENSES DPR-77 AND DPR-79 -  
LICENSEE EVENT REPORT (LER) 50-327/92016

The enclosed LER provides details concerning planned entries into Limiting Condition for Operation (LCO) 3.0.3 when both control room emergency ventilation system (CREVS) trains were removed from service to facilitate damper replacement in the CREVS duct.

This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation prohibited by technical specifications.

Sincerely,

  
J. L. Wilson

Enclosure  
cc: See page 2

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U.S. Nuclear Regulatory Commission

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September 18, 1992

cc (Enclosure):

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## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Sequoyah Nuclear Plant, Unit 1										DOCKET NUMBER (2) 05000321710F05		PAGE (3) 05							
TITLE (4) Planned Entries Into LCO 3.0.3 When Both Control Room Emergency Ventilation Trains Were Removed From Service to Facilitate Damper Replacement																			
EVENT DAY (5)				LER NUMBER (6)				REPORT DATE (7)				OTHER FACILITIES INVOLVED (8)							
				SEQUENTIAL REVISION								FACILITY NAMES DOCKET NUMBER(S)							
MONTH DAY YEAR				NUMBER NUMBER				MONTH DAY YEAR				Sequoyah, Unit 2 050003218							
081992				0160				091892				050003218							
OPERATING MODE (9) THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5:																			
(Check one or more of the following)(11)																			
20.40(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)							
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)				OTHER (Specify in							
20.405(a)(1)(iii)				XX 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)				Abstract below and in							
20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)				Text, NRC Form 366A)							
20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(x)											
LICENSEE CONTACT FOR THIS LER (12)																			
NAME										TELEPHONE NUMBER									
Jan Bajraszewski, Compliance Licensing										613843-7749									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																			
CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRC		CAUSE		SYSTEM		COMPONENT		MANUFACTURER		REPORTABLE TO NRC	
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)				MONTH DAY YEAR					
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO									
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																			

On August 19, 1992, at 0644 Eastern daylight time, with Units 1 and 2 in power operation at approximately 100 percent, Limiting Condition for Operation (LCO) 3.0.3 was entered for 18 minutes when both control room emergency ventilation system (CREVS) trains were taken out of service. This was the first of four planned LCO 3.0.3 entries (each entry varied from 8 to 19 minutes) as a result of removing both CREVS trains from service to support scheduled field work for replacement of two dampers. The modification replaced one inlet damper in each of the control building emergency air clean-up filter unit (EACFU) trains. The LCO was entered, and the EACFU equipment was taken out of service for personnel safety during installation and removal of a blank-off dam in the duct. Both dampers were successfully replaced with low-leakage dampers.

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TEXT CONTINUATION

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		SEQUENTIAL		REVISION							
		YEAR	NUMBER	NUMBER							
Sequoyah Nuclear Plant, Unit 1	0500032792	0	1	6	0	0	0	2	OF	0	5

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

## I. PLANT CONDITIONS

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

## II. DESCRIPTION OF EVENT

## A. Event

On August 19, 1992, at approximately 0644 Eastern daylight time (EDT), Limiting Condition for Operation (LCO) 3.0.3 was entered when both control room emergency ventilation system (CREVS) (EJIS Code VI) trains were taken out of service. This was the first of four planned LCO 3.0.3 entries as a result of removing both CREVS trains from service to support scheduled field work for replacement of two dampers. The modification replaced one inlet damper to each of control building emergency air clean-up filter unit (EACFU) trains. The CREVS duct configuration is such that a common duct feeds a tee, and each leg of the tee feeds one EACFU train. No isolation exists between the common feed duct and the feeds to each train. The duct access panel is located in the center of the tee. The blank-off dam was brought through the access panel and installed on one leg of the tee. This allowed isolation of one EACFU train for modification of the duct to accept the new damper and removal of the existing damper while the other EACFU train was in service. Because of this duct configuration, LCO 3.0.3 was entered, and both EACFU trains were taken out of service for personnel safety, during installation and removal of a blank-off dam in the duct. Both dampers were successfully replaced with low-leakage dampers.

## B. Inoperable Structures, Components, or Systems That Contributed to the Event

None.

## C. Date and Approximate Time of Major Occurrences

August 19, 1992 at 0644 EDT	LCO 3.0.3 was entered; both EACFU trains were taken out of service for installation of a blank-off dam in the "A" train duct.
August 19, 1992 at 0702 EDT	The "B" train EACFU was returned to service, and LCO 3.0.3 was exited.
August 20, 1992 at 1220 EDT	LCO 3.0.3 was entered; the "B" train EACFU was taken out of service. The blank-off dam in the "A" train duct was removed.

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		YEAR	NUMBER	REVISION			
Sequoyah Nuclear Plant, Unit 1	050003 27 9 2	0	1	6	0	0	0
					3	0	5

TEXT (If more space is required, use additional NRC Form 365A's) (17)

August 20, 1992 at 1228 EDT The "B" train EACFU was returned to service, and LCO 3.0.3 was exited.

August 25, 1992 at 0629 EDT LCO 3.0.3 was entered; both EACFU trains were taken out of service for installation of a blank-off dam in the "B" train duct.

August 25, 1992 at 0648 EDT The "A" train EACFU was returned to service, and LCO 3.0.3 was exited.

August 27, 1992 at 0555 EDT LCO 3.0.3 was entered; the "A" train EACFU was taken out of service for removal of the blank-off dam in the "B" train duct.

August 27, 1992 at 0605 EDT The "A" train EACFU was returned to service, and LCO 3.0.3 was exited.

D. Other Systems or Secondary Functions Affected

None.

E. Method of Discovery

The need for the LCO 3.0.3 entries was identified in the modification document. Steps were provided in the work document to ensure that the time in the LCO was kept to a minimum during replacement of the damper assemblies. This was accomplished by fabrication of a mock-up duct section that was used by craftsmen to practice installation and removal of the blank-off dam.

F. Operator Actions

Operators evaluated the work document and implemented the preplanned action steps as delineated in the work document.

G. Safety System Responses

Not applicable - no safety system responses were required.

III. CAUSE OF EVENT

A. Immediate Cause

Both of the control building EACFU trains were removed from service as part of the preplanned actions delineated in a work document for replacement of two damper assemblies.



## LICENSEE EVENT REPORT (LER)

## TEXT CONTINUATION

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Sequoyah Nuclear Plant, Unit 1		YEAR		NUMBER		NUMBER		NUMBER		NUMBER												
		6	5	0	0	0	3	1	2	1	7	9	2	--	0	1	6	--	0	0	0	4

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

B. Root Cause

None.

C. Contributing Factors

The LCO 3.0.3 entries were required because a common-feed duct had to be accessed to install a blank-off dam for isolation of one EACFU during damper replacement. This required both EACFU trains to be removed from service at the same time to ensure personnel safety during installation and removal of the blank-off dam.

Bypass leakage through the existing dampers was higher than desirable, resulting in additional testing and increased surveillance instruction performance frequency.

## IV. ANALYSIS OF EVENT

The CREVS ensures that equipment and instrumentation temperatures are maintained within allowable limits and that the control room will remain habitable for Operations personnel during and following all credible accident conditions. The modification replaced existing dampers with new low-leakage type dampers. This change is expected to reduce the maintenance required for the control building EACFUs. Additionally, the work document contained a contingency plan for each train in the unlikely event that CREVS was required during the modification process. Because the LCO 3.0.3 entries were of short duration and part of a planned modification sequence, this event did not adversely affect the health and safety of plant personnel or the general public.

## V. CORRECTIVE ACTIONS

A. Immediate Corrective Actions

Not applicable - the entries into LCO 3.0.3 were part of a preplanned sequence of activities in the implementation of a modification.

B. Corrective Action to Prevent Recurrence

None.

## VI. ADDITIONAL INFORMATION

A. Failed Components

None.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
		SEQUENTIAL	REVISION
Sequoyah Nuclear Plant, Unit 1		YEAR	NUMBER
	050003 12 7 9 12	0 1 6	0 0 0 5 OF 0 5

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

B. Previous Similar Events

A review of previous events did not identify an LER associated with planned entry into LCO 3.0.3 for performance of a field modification. The review did identify an LER (LER 327/90015) that described a planned LCO 3.0.3 entry for performance of maintenance activities on a pressurizer level transmitter. Because the LCO 3.0.3 entry was preplanned, recurrence control corrective actions are not applicable to LER 327/90015; therefore, LER 327/90015 is not applicable to the LCO 3.0.3 entries described by this LER.

VII. COMMITMENTS

None.