

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 3, 1985

U.S. Nuclear Regulatory Commission  
Region II  
ATTN: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/85-16 AND 50-328/85-16 - RESPONSE TO VIOLATION

Enclosed is our response to D. M. Verrelli's June 4, 1985 letter to  
H. G. Parris transmitting IE Inspection Report Nos. 50-327/85-16 and  
50-328/85-16 for our Sequoyah Nuclear Plant which cited TVA with one Severity  
Level V Violation.

If you have any questions, please get in touch with R. E. Alsup at FTS  
858-2725.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. A. Domer*

J. A. Domer, Chief  
Nuclear Licensing Branch

Enclosure

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

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RESPONSE - NRC-OIE INSPECTION REPORT NOS.  
50-327/85-16 AND 50-328/85-16  
D. M. VERRELLI'S LETTER TO H. G. PARRIS  
DATED JUNE 4, 1985

Violation 50-327, 328/85-16-01

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 8 of Appendix A of Regulatory Guide 1.33 requires specific procedures for surveillance tests. Surveillance Instruction SI-82 was established to conduct surveillance activities on radiation monitors.

Contrary to the above, as of April 4, 1985, Surveillance Instruction-82 was not adequately established and was not implemented in that:

1. Testing of radiation monitor RM 90-101 was conducted without the monitor functions blocked as required by this procedure. This resulted in an unnecessary auxiliary building isolation.
2. The procedure does not incorporate technical information concerning circuit behavior after incorporation of time delay modifications to the radiation monitor circuitry. This contributed to the unnecessary auxiliary building isolation.

This is a Severity Level V violation. This violation applies to both units (Supplement I).

1. Admission or Denial of Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

The Sequoyah Nuclear Plant (SQN) Surveillance Instruction (SI)-82 provides the test procedure for verifying radiation monitor RM-90-101 (Auxiliary Building stack radiation monitor). The SI provides the steps required to properly block the monitor channel being tested to prevent inadvertent Auxiliary Building isolation (ABI).

The violation occurred because a 10-second time delay had been added to the ABI circuit but was not referenced in SI-82. The instrument mechanics (IMs) performing the procedure were confused by the alarm not coming in at the exact time the ABI set point was obtained and inadvertently got out-of-sequence with the instruction steps. After the IMs failed to get the alarm on the first channel tested, they proceeded to the second channel. They moved the ABI block from the first channel to the second channel per SI-82 instruction steps. While performing the test on the second channel, the IMs remembered the 10-second time delay and returned to the first channel to retest it; however, they forgot to reinstate the ABI block function. This condition caused testing to be performed on an unblocked monitor channel which resulted in the inadvertent ABI actuation.

For further information refer to SQN unit 1 LER SQRO 50-327/85-14.

3. Corrective Steps Taken and Results Achieved

A temporary change, PORC approved for permanent revision, was made on SI-82 to add a reference to the 10-second time delay to ensure there would be no future confusion.

No ABI actuations have occurred that were due to the problem addressed in the violation since the change was made.

4. Corrective Steps Taken to Avoid Future Violations

The revision of SQN's SI-82 and subsequent retraining of SQN personnel will resolve the alleged violation.

5. Date When Full Compliance Will Be Achieved

The SQN procedure revision will be complete, and training via a memorandum from the SQN maintenance supervisor to maintenance personnel will be complete by July 24, 1985.