

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah Units 1 and 2

Docket Nos. 50-327 and 50-328
License Nos. DPR-77 and DPR-79

The following violations were identified during an inspection conducted on August 6 - September 5, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2 Appendix C).

1. Technical Specification 3.5.1.1 requires that each cold leg injection accumulator shall be operable with the isolation valve open, contain a volume of borated water between 7857 and 8071 gallons with a boron concentration between 1900 and 2100 ppm, and a nitrogen cover-pressure of between 385 and 447 psig. With one cold leg injection accumulator inoperable, except as a result of a closed isolation valve, the inoperable accumulator must be restored to operable status within one hour or the reactor must be placed in at least Hot Standby within the next six hours and Hot Shutdown within the following six hours.

Contrary to the above, on August 9 and 10, 1985, the Unit 2 number 3 loop cold leg injection accumulator was technically inoperable in that it did not contain a volume of borated water between 7857 and 8071 gallons or a concentration of boron between 1900 and 2100 ppm for a period of seven hours and forty minutes. This exceeded the requirement to be in Hot Standby by forty minutes.

This is a Severity Level IV violation (Supplement I). This applies to Unit 2 only.

2. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering safety related activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Technical Instruction TI-51, Assignment of Detailed Test Methods and Responsibility for Non-Destructive Testing, implements this requirement in the area of non-destructive testing.

Contrary to the above, TI-51 was not adequately implemented on July 31, 1985 during a nondestructive liquid penetrant test of the Unit 1 CVCS letdown sample line. This resulted in the failure to identify a crack in the sample line which existed approximately one third way through the wall thickness. Independent analysis of the failure identified both dye penetrant and developer inside the crack indicating that the crack existed when the examination was conducted. The existing crack resulted in a CVCS letdown line leak on August 11, 1985.

This is a Severity Level IV violation (Supplement I). This applies to Unit 1 only.

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3. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering safety related activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Maintenance Instruction MI-10.1, Diesel Generator Inspection, implements this requirement during maintenance activities on the diesel generators.

Contrary to the above, the following portions of MI-10.1 were not implemented during performance of the procedure on August 14, 1985.

- a. Step 5.4.1.1 of MI-10.1 directs the technician to use low pressure air to remove dust from the diesel generator collector rings and stator. This step was not implemented in that the inspector observed a technician checking this step complete without having used low pressure air to clean the collector rings and stator.
- b. Step 5.4.1.2 of MI-10.1 directs the technician to remove oil, grease or accumulation of dirt from the diesel generator collector with clean, bound end, lintless wiping cloths. This step was not adequately implemented in that the inspector observed a technician using knit material without bound ends to clean the diesel generator collector.
- c. Step 5.4.1.8 of MI-10.1 directs the technician to check frame hold down and foundation bolts to see that they are tight and to record results and any unusual findings on Inspection Sheet 5.4. This step was not implemented during the performance of MI-10.1.

These three examples together constitute a Severity Level V violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including : (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and, (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790 (d) or 10 CFR 73.21.

OCT 01 1985

Date: _____