

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 May 6 - June 5, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification 6.8.1 requires that written procedures be established, covering safety related activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

- a. DPSO-SMI-1DG, "Relay Functional Tests for Diesel Generator Protective Relays," and MI-10.1, "Diesel Generator Inspection," were established to implement Technical Specification surveillance requirements.

Contrary to the above, adequate procedures were not established in that DPSO-SMI-1DG did not specify Emergency Diesel Generator (EDG) local-remote switch position in the EDG cubical nor in the control room prior to the completion of paragraph 9.A(4)4.1 and did not require that controlled test equipment be used in the performance of step 9.A(3).

- b. SQM-24, "Torque and Limit Switch Settings for Motor-Operated Valves," was established to comply with the above requirement for maintenance procedures on safety-related equipment.

Contrary to the above, SQM-24 did not incorporate the limit switch adjustment technique identified in MI-11.2, "Motor Operated Valve Adjustment Guidelines," which resulted in damage to two safety related valves and a reactor trip.

- c. SI-484, "Periodic Calibration of Reactor Vessel Level Instrumentation System (RVLIS) and RCS Wide Range Pressure Channels (P-403, P-406) (Refueling Outage)," was established to implement post-modification testing requirements.

Contrary to the above, SI-484 was not adequately established for configuration control in that the procedure did not include measures to assure that a sensing line common to RVLIS and Reactor Coolant System pressure transmitter PT-68-66 was isolated so as to preclude actuation of a pressure interlock for the Residual Heat Removal (RHR) isolation valves. This deficiency resulted in the unanticipated isolation of the RHR system due to a high pressure signal sensed by the transmitter during RVLIS fill, vent, and pressurization.

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The above examples constitute a Severity Level IV Violation. This violation applies to both units. (Supplement I).

2. Technical Specification 6.11 requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure. These requirements are implemented by procedure RCI-1, "Radiological Hygiene Program," which requires each employee to adhere to Health Physics procedures and protective measures. One protective measure, Radiation Work Permit (RWP) 1-85-105, required a canvas hood be worn in addition to other protective clothing while conducting activities in the Unit 1 containment radiation area.

Contrary to the above, RWP 1-85-105 requirements were not implemented in that an individual was observed conducting activities in the Unit 1 containment without the prescribed canvas hood.

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

3. Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained covering the procedures referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Procedure MI-10.1 was established to implement requirements for Emergency Diesel Generator surveillance testing. MI-10.1 paragraph 5.3.1.2.2.5 requires technicians to set up test equipment prior to diesel engine start and paragraph 5.3.1.2.4 requires the technician to verify receipt of the "Engine Running" annunciation at 850 rpm engine speed.

Contrary to the above, as of May 21, 1985, MI-10.1 was not implemented in that technicians did not set up their test equipment prior to engine start and the technician erroneously recorded 850 rpm as the annunciation speed when the annunciation actually energized at about 875 rpm.

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

4. Technical Specification 6.8.1 requires that written procedures be implemented covering activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, Workplan No. 11188, which was established to install the battery racks and battery cells for vital battery V, was not implemented in that installation of the intercell spacers for vital battery V was not completed in accordance with the vendor drawings for installation of the battery racks as required by the workplan.

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

Date: JUL 30 1985