

February 19, 1997

NOED No. 97-2-001

Tennessee Valley Authority  
ATTN: Mr. Oliver D. Kingsley, Jr.  
President, TVA Nuclear and  
Chief Nuclear Officer  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR TENNESSEE VALLEY AUTHORITY  
REGARDING SEQUOYAH NUCLEAR PLANT (UNITS 1 AND 2)

In the enclosed letter dated February 14, 1997, you requested the U.S. Nuclear Regulatory Commission (NRC) to exercise discretion not to enforce compliance with the actions required in Units 1 and 2 Technical Specification (TS) 3.8.1.1, Action b. These TSs require that with one diesel generator set inoperable, all four diesel generator sets must be restored to the operable status within 72 hours or both units must be in at least the hot standby condition within the next six hours and in the cold shutdown condition within the following 30 hours. Your letter documented information discussed with the NRC in telephone conversations on February 14, 1997, at 11:30 a.m., and 3:00 p.m. You stated that on February 14, 1997, at 5:25 p.m., the Sequoyah Nuclear Plant would not be in compliance with the Unit 1 and 2 TS Action statement and therefore shutdown of Units 1 and 2 would be required. This TS Action statement was entered on February 11, 1997, at 5:25 p.m. You requested that a Notice of Enforcement Discretion (NOED) be issued pursuant to the NRC's policy regarding exercise of discretion for an operating facility, set out in Section VII.c. of the "General Statement of Policy and Procedures for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600, and be effective from 5:25 p.m., on February 14, 1997, to 5:25 p.m., on February 16, 1997.

This condition was a result of problems encountered during planned testing and maintenance on the 2A-A emergency diesel generator (EDG). Specifically, these problems initially involved an inadequate polarization index level on the 2A-A EDG 'C' phase winding. This problem was resolved; however, during subsequent testing an unrelated problem with degraded performance of the 2A2 engine governor was identified. You stated that your root cause evaluations identified that replacement of the governor actuator would resolve the degraded performance of the 2A2 engine. You requested an additional 48 hours after the expiration of TS 3.8.1.1, Action b, to complete the testing of the 2A-A EDG after the governor replacement to ensure EDG operability.

You provided as your safety rationale for issuing the NOED several improvements to the plant/electrical grid interfaces at Sequoyah that have been made since the original 72-hour allowed outage time of TS was established. The results of your probabilistic safety assessment indicated that only a small change in the core damage frequency would occur as a result

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of the increased outage time for EDG 2A-A. You provided information on the high reliability of Sequoyah EDGs and noted that an allowed outage time of 7 days had been justified for a planned EDG maintenance outage once per 18-months per EDG in your TS Change Request 96-08 (submitted to the NRC August 22, 1996).

You stated that compensatory measures would include the performance of TS surveillance requirements (SR) 4.8.1.1.1.a every four hours. You stated that B-train components would be protected while the 2A-A EDG is out of service, and the switchyard would be protected to ensure offsite power supply reliability. You also stated that your request for enforcement discretion had been approved by your Plant Onsite Review Committee. In addition, you successfully tested EDGs 1A-A, 1B-B, and 2B-B prior to the time at which TS 3.8.1.1, Action b, would require a plant shutdown.

At the request of the NRC, you stated that operators would be provided refresher training for contingency plans to cross connect electrical loads during a loss of offsite power emergency. Also, Engineered Safety Features equipment, other than that needed to support any EDG 2A-A testing during the 48 hour extension, would be protected.

The staff has reviewed the above rationale regarding improvements in plant electrical grid interfaces, the results of your probabilistic safety assessment, and your EDG reliability information. In addition, your compensatory measures, along with additional measures requested by the NRC, provide the appropriate justification to support a conclusion that enforcement discretion should be given to avoid undesirable transients as a result of forcing compliance with the TS, and would thus minimize potential safety consequences and operational risks.

On the basis of the staff's evaluation of your request, including the compensatory measures described above, the staff has concluded that an NOED is warranted because we are clearly satisfied that this action involves minimal or no safety impact and has no adverse radiological impact on public health and safety. Therefore, it is our intention to exercise discretion not to enforce compliance with TS 3.8.1.1, Action b, for the period from 5:25 p.m., EST on February 14, 1997, to 5:25 p.m., EST on February 16, 1997. However, this enforcement discretion is contingent upon the continued belief that the root cause of the EDG 2A-A problem is associated with the engine governor. If, during the additional 48 hours of enforcement discretion, you find that the root cause is other than the engine governor, or a new problem is identified during EDG 2A-A testing that would require the EDG to be declared inoperable, this enforcement discretion is terminated, after which you must immediately comply with Action b of TS 3.8.1.1. This letter documents our telephone conversation on February 14, 1997, at 4:20 p.m., when we orally granted this notice of enforcement discretion. We understand that the condition causing the need for this NOED was corrected by you causing you to exit from TS 3.8.1.1, Action b, and this NOED on February 15, 1997, at 1:30 p.m.

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However, as stated in the Enforcement Policy, action will normally be taken, to the extent that violations were involved, for the root cause that led to the noncompliance for which this NOED was necessary.

Sincerely,

(Original signed by L. A. Reyes)

Luis A. Reyes  
Regional Administrator

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

Enclosure: TVA letter dated February 14, 1997  
w/encl

cc w/encl: (See page 4)

TVA

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cc w/ encl:

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James Lieberman, OE  
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COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES <input checked="" type="checkbox"/> NO

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