

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Sequoyah

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

The following violations were identified during an inspection conducted on December 9-13, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification (TS) 6.8.1 requires that adequate written procedures be established and maintained covering safety-related activities stated in Appendix A of Regulatory Guide 1.33, Revision 2, which include the use of surveillance procedures and system operating instructions.

Contrary to the above, in the instances cited below, the licensee inadequately established or maintained surveillance instructions and system operating instructions.

- a. SI-256, Periodic Calibration of Overcurrent Relays and Distance Relays on 6.9 kV Reactor Coolant Pumps on 6.9 kV Unit Boards, contains the following inadequate acceptance criteria:
 - (1) For primary overcurrent protective devices, the procedure establishes a trip setpoint amperage tolerance value of $\pm 5\%$. TS Table 3.8-1 for both units requires a $\pm 2\%$ tolerance.
 - (2) For primary overcurrent protective devices, the procedure establishes a 75 degree impedance angle of maximum torque. The proper value is 105 degrees.
 - (3) For primary overcurrent protective devices, the procedure requires distance relay targets to operate between 1.0 and 2.0 amperes with DC voltage applied. The vendor manual for these type IAC 66K relays requires proper operation between 0.1 and 2.0 amperes.
- b. Procedure SOI 30.6, Auxiliary Building Gas Treatment System, listed use of fuses with incorrect amperage ratings and prescribed positioning of a block switch which had been previously disconnected from the circuit.
- c. Instrument maintenance procedure IMI-99, Reactor Protection System Calibration and Functional Testing, prescribed use of inadequate measuring and test equipment. The measuring and test equipment prescribed was only 2 to 2.5 times more accurate than the measured parameter when the setpoint methodology used to determine reactor protection setpoints assumed the equipment was ten times more accurate than the measured parameter.

This is a Severity Level IV Violation (Supplement I).

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2. TS 6.5.1.6.d requires that the Plant Operations Review Committee (PORC) review unit operations to detect potential nuclear safety hazards.

Contrary to the above, the PORC failed to conduct a formal review of the potential nuclear safety hazards associated with accuracy of Measuring and Test Equipment (M&TE) used for calibration of Reactor Protection System (RPS) instrumentation. The M&TE accuracy for such test equipment as Fluke 8600 and Ashcroft Digigage used for calibrating RPS instrumentation did not meet the accuracy assumptions used in the setpoint methodology for RPS trip setpoints.

This is a Severity level IV Violation (Supplement I).

3. TS 6.8.1 requires that written procedures be implemented covering safety-related activities stated in Appendix A of Regulatory Guide 1.33, Revision 2, which includes the use of surveillance and administrative procedures. Surveillance Instruction (SI) 256, Periodic Calibration of Overcurrent Relays and Distance Relays on 6.9 kv Reactor Coolant Pumps on 6.9 kv Unit Boards was established to control testing of the primary and secondary overcurrent containment penetration protection devices required by TS 3/4.8.3. Administrative Instruction (AI) 4, Plant Instructions - Document Control, was established to provide controls for procedure changes, as required by TS 6.8.3.

Contrary to the above, these procedures were not implemented in that:

- a. Initial and independent verification signoffs for conformance to SI-256 Relay Test Record Sheet acceptance criteria were made when the recorded value was outside the procedure acceptance criteria. In addition, supervisory review of the surveillance package did not identify these deficiencies.
- b. Proper procedure change control requirements of AI-4 were not implemented for pen and ink changes made in the units of measure for Relay Test Record parameters of SI-256. Supervisory review of the surveillance package did not identify these deficiencies.

This is 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.

Date: JAN 22 1986