

Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379-2000

R.J. Adney
Site Vice President
Sequoyah Nuclear Plant

April 17, 1997

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of
Tennessee Valley Authority

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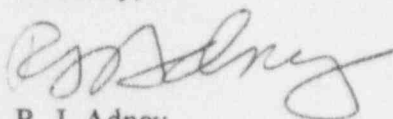
Docket Nos. 50-327
50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327,
328/97-01 - REPLY TO NOTICE OF VIOLATION (NOV) 50-327, 328/97-01-01

Enclosed is TVA's reply to Mark S. Lesser's letter to O. D. Kingsley, Jr., dated
March 18, 1997. The violation notice was associated with inadequate alarm response
procedures pertaining to the diesel generators.

If you have questions regarding this response, please telephone R. H. Shell at (423) 843-7170.

Sincerely,



R. J. Adney

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission
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cc (Enclosure):

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U.S. Nuclear Regulatory Commission
Region II
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Atlanta, Georgia 30323-2711

ENCLOSURE 1
RESPONSE TO NRC NOTICE OF VIOLATION 50-327, 328/97-01-01
INSPECTION REPORT NOS. 50-327, 328/97-01
MARK S. LESSER'S LETTER TO OLIVER D. KINGSLEY, JR.
DATED MARCH 18, 1997

VIOLATION 50-327, 328/97-01-01

"Technical Specifications 6.8.1.a requires, in part, that procedures shall be established implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Section 5, includes procedures for alarm conditions. This section lists the requirements for safety related alarm response procedures which included: (1) the meaning of the annunciator, (2) the source of the signal, (3) the immediate automatic action, (4) the immediate operation action, and (5) the long range action.

"Contrary to the above, The alarm response procedure for the 2A-A Emergency Diesel Generator was inadequate in that:

1. Emergency diesel generator (EDG) alarm response procedure 0-AR-M26-C (B-2), Diesel Generator 2A-A Exhaust Temperature Difference, listed the setpoints for the three alarm conditions as 100°F; however, the actual setpoints were 200°F.
2. EDG alarm response procedure 0-AR-M26-C (B-2), Diesel Generator 2A-A Exhaust Temperature Difference, required the diesel to be declared inoperable if the local temperatures exceeded 100°F differential; however, the EDG would not become inoperable until the temperatures exceeded 200°F differential.
3. EDG alarm response procedure 0-AR-M26-C (B-1), Diesel Generator 2A-A Governor Actuator Difference, listed the alarm setpoint as 0.04 (4%) difference between the hydraulic governor scales of the two engines. The local alarm response procedure noted that acceptable operation would be verified to be less than 0.1 (10%) difference between the governor scales. The control room alarm response procedure incorrectly listed acceptable operation as less than 1.0 (100%) difference between the governor scales.
4. EDG alarm response procedure 0-AR-M26-C (B-2), Diesel Generator 2A-A Exhaust Temperature Difference, and EDG alarm response procedure 0-AR-M26-C (B-1), Diesel Generator 2A-A Governor Actuator Difference, both require the EDG to be declared inoperable if the turbocharger inlet temperature exceeded 100°F differential; however, the alarm response procedures did not provide guidance or limitations for continuing to operate the EDG with valid alarm conditions. These procedures did not provide sufficient immediate and long range operator actions.

"This is a severity level IV violation (Supplement 1)."

REASON FOR THE VIOLATION

The reason for the violation was determined to be inadequate technical review by the preparers and the reviewers of the procedures or procedure revisions. The technical review of the diesel generator (D/G) annunciator response procedures failed to identify the correct alarm setpoints for the D/G exhaust temperature differential alarm and for the governor actuator differential alarm. The technical review failed to recognize the need to provide specific guidance, in the annunciator response procedures, to operations personnel for continuing to run the D/G with alarms present.

CORRECTIVE ACTIONS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

The D/G annunciator response procedure was revised to state that the exhaust temperature differential setpoint is 200 degrees F and to require that the D/G be removed from service if the temperature differential reaches 200 degrees F.

The control room annunciator response procedure for the governor actuator differential was revised to state that the acceptable differential value is less than 0.1 and to require that the D/G be removed from service if the governor actuator differential exceeds 0.1.

The D/G local and main control room annunciator response procedures were verified to be consistent.

Lessons learned from this event and the message that good operating practices are not limited to those specified in the procedure were communicated in writing to Operations personnel.

Lessons learned from the failure to have accurate annunciator procedures were communicated in writing to appropriate site personnel. The specifics of these procedure inadequacies and the responsibilities of procedure preparers and technical reviewers for procedure quality were emphasized.

CORRECTIVE ACTIONS THAT WILL BE TAKEN TO AVOID FUTURE VIOLATIONS

A review of the annunciator response procedures will be performed to determine if adequate direction is provided for equipment operation with valid alarm conditions present. The results of this review will also be used to determine if further actions are needed relative to the quality of the procedural technical reviews.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With respect to the cited violation, TVA is in full compliance.

ENCLOSURE 2
COMMITMENT

A review of the annunciator response procedures will be performed to determine if adequate direction is provided for equipment operation with valid alarm conditions present. The results of this review will also be used to determine if further actions are needed relative to the quality of the procedural technical reviews. This item will be completed by July 14, 1997.