

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 violation was identified during an inspection conducted on October 6, 1985 - November 5, 1985. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10CFR Part 2 Appendix C).

Technical Specification 6.8.1 requires that written procedures be implemented and maintained covering safety-related activities stated in Appendix A of Regulatory Guide 1.33, Revision 2.

- a. Instrument Maintenance Instructions IMI-99 RT 611A, Response Time Testing Engineered Safety Feature Actuation, IMI-99 RT 7.23, Response Time Test Loop 4 Steam Generator Level Channel III (L-548) and IMI-99 RT 7.17, Response Time Test Loop 2 Steam Generator Level Channel III (L-528) were established to perform reactor trip response time testing. RT 611A Step 5.5.6 requires that components which are not returned to normal position be listed in the data sheet cover page as discrepancies. RT 7.17 and RT 7.23 require that status lights be verified in a non-illuminated condition except as allowed under Step 2.

Contrary to the above, the subject procedures were not adequately implemented in that components required to be returned to a normal position by Step 5.5.6 in procedure IMI-99 RT 611A had not been returned to normal position and had not been listed as discrepancies in the data sheet. Also, verification of status lights had not been made in accordance with procedures IMI-99 RT 7.17 and IMI-99 RT 7.23.

- b. Administrative Instruction AI-19, Part 4 - Plant Modifications After Licensing, was established to implement the use of Work Plans on major modification efforts on safety related equipment. Work Plan 11802 provided the procedure for assembly and testing of safety-related containment penetrations and required the use of a validated vendor's manual in the assembly of the feedthru tubes.

Contrary to the above, Work Plan 11802 was not adequately established or implemented in that the licensee assembled the penetration without the use of a validated vendor manual.

- c. Surveillance Instruction, SI-82.2 - Functional Tests for the Radiation Monitoring System, was established to implement Technical Specification radiation monitoring surveillance requirements.

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Contrary to the above, SI-82.2 was not implemented in that the technician did not insert a test signal into the Unit 2 radiation monitor identified by the procedure. Instead, the technician inserted the test signal into the Unit 1 monitor causing a containment ventilation isolation.

- d. Instrument Maintenance Instruction IMI-134, Configuration Control of Instrument Maintenance Activities, was established to control work activities during safety related maintenance.

Contrary to the above, IMI-134 was not implemented in that a technician failed to adequately identify the power source for removal and reinstallation of spent fuel pool radiation monitor O-RM-90-103 on the configuration control sheet. This resulted in plugging the monitor into a non-safety-related power source.

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

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: DEC 10 1985