

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)  
Sequoyah, Unit 1

DOCKET NUMBER (2)

0 5 0 0 0 3 2 7 1 OF 0 4

PAGE (3)

Title  
Technical Specification Surveillance Requirement To Sample Containment Not Properly Implemented Before Containment Purge Operations Due To Incomplete Procedure Review

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)												
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)										
0	3	1	7	8	8	8	8	8	0	1	5	0	0	0	4	0	8	8	8	Sequoyah, Unit 2	0 5 0 0 0 3 2 8
												0 5 0 0 0									

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)											
5		20.402(b)				20.405(s)				50.73(a)(2)(iv)		73.71(b)	
		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)		73.71(c)	
POWER LEVEL (10)	0 0 0	20.405(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)	
		20.405(a)(1)(iii)		XX		50.73(a)(2)(i)				50.73(a)(2)(viii)(A)			
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)			
		20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)			

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Tom Rogers	
J. A. Naik, Plant Operations Review Staff	6 1 5 8 7 0 - 6 8 6 2

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	XX				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On March 17, 1988, at 1500 EST with unit 1 in mode 5 (cold shutdown) and unit 2 in mode 3 (hot standby), it was discovered that Technical Specification (TS) Surveillance Requirement (SR) 4.11.2.1.2 was not completely incorporated into the implementing procedure. TS SR 4.11.2.1.2 is implemented, in part, by Surveillance Instruction (SI)-410.2, "Containment (Upper, Lower) Purge." TS SR 4.11.2.1.2 requires an upper and lower containment sample to be taken for radioactivity analysis before all containment purge operations. SI-410.2, however, only required a sample taken and analyzed of the compartment to be purged since the containment purge system can be aligned for purging the upper or the lower containment compartments.

The cause of SI-410.2 incompletely implementing TS SR 4.11.2.1.2 is attributed to an oversight during the Sequoyah initial SI-1, "Surveillance Program," Appendix F review of SI-410.2. SI-1, Appendix F, is used to review SIs in order to ensure TS SR are properly implemented. The oversight made during the SI-410.2 review was the failure to require both containment compartments be sampled and analyzed in SI-410.2. SI-1, Appendix F reviews were conducted on all SIs during initial program implementation in 1986.

No immediate operator actions were required because a containment purge was not in progress at the time of the discovery. As corrective actions to properly implement TS SR 4.11.2.1.2, SI-410.2 was revised on March 18, 1988, to require samples taken from the upper and lower containment compartments before conducting containment purge operations. An investigation is being conducted to determine if a generic weakness exists in the SI-1, Appendix F review process that has allowed previously identified oversights to be made during the initial SI-1, Appendix F review. Appropriate corrective actions based on this investigation will then be taken.

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3151-0104

EXPIRES: 8/31/88

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TEXT (If more space is required, use additional NRC Form 365A's) (17)

## DESCRIPTION OF EVENT

On March 17, 1988, at 1500 EST with unit 1 in mode 5 (0 percent power, 6 psig, 130 degrees F) and unit 2 in mode 3 (0 percent power, 2235 psig, 547 degrees F), it was discovered that Technical Specification (TS) Surveillance Requirement (SR) 4.11.2.1.2 was not completely incorporated into the implementing procedure used to prepare for containment purge operations (EIIS Code VA). TS SR 4.11.2.1.2 requires, in part, to sample upper and lower compartments for principal gamma emitter analysis and tritium analysis of the containment (EIIS Code NH) before performing purge operations while the unit is in operational modes 1, 2, 3, or 4 in accordance with Table 4.11-2 of TS. This requirement is implemented at Sequoyah for both units via performance of Surveillance Instruction (SI)-410.2, "Containment (Upper, Lower) Purge." SI-410.2, however, did not require sampling both the lower and upper compartments of containment for analysis for all containment purge operations. It only required a sample of the containment compartment to be purged.

This discovery was made while making a change to SI-410.2 in order to clarify administrative details concerning containment purge sampling. As part of the Sequoyah SI change process, all SI changes are reviewed, in accordance with SI-1, "Surveillance Program," Appendix F, to ensure all applicable TSs are incorporated. Upon performing the SI-1, Appendix F review, it was recognized that full compliance with TS SR 4.11.2.1.2 had not been implemented by SI-410.2. Upon discovering this condition, Operations personnel were notified of the finding, and a change was initiated to correct SI-410.2. The partial implementation of TS SR 4.11.2.1.2 in SI-410.2 has resulted in a failure to completely meet the TS SR since receiving the facility operating licenses.

## CAUSE OF EVENT

The cause of this occurrence is attributed to an oversight during the initial implementation of the SI-1, Appendix F review process. A complete review of SI-410.2 was conducted using SI-1, Appendix F, and the resulting findings were incorporated on April 16, 1987, in revision 9. The purpose of this review, in part, was to ensure the applicable TS SRs are implemented within the SI. However, it was not noticed through the initial review that the TS SR 4.11.2.1.2, Table 4.11-2, notation "i," states that the upper and lower compartments of the containment shall be sampled before purging. Though many findings have been made and corrected using this review process, the personnel performing the review did not recognize that SI-410.2 did not fully comply with TS SR 4.11.2.1.2.

## ANALYSIS OF EVENT

This report is submitted pursuant to the requirements of 10 CFR 50.73, paragraph a.2.i, as a condition prohibited by TSs.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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TEXT (if more space is required, use additional NRC Form 365A's) (17)

The purpose of performing TS SR 4.11.2.1.2 is to ensure the dose rate due to Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half lives greater than eight days in gaseous effluents are within the limits required by TS Limiting Condition for Operation (LCO) 3.11.2.1. TS LCO 3.11.2.1 provides the dose rate limits due to radioactive materials released in gaseous effluents to areas at or beyond the site boundary. The subject sample omitted from SI-410.2 was specifically applicable to containment purge releases for principal gamma emitter analysis and tritium analysis.

Since cross ventilation between the upper and lower containment compartments is possible whenever a differential pressure exists between compartments, a sample of only one compartment could be nonconservative if the unsampled compartment contains higher radioactivity levels than the sampled compartment. Radioactivity level differences between compartments could exist since there is no mechanism to ensure uniform mixing.

## CORRECTIVE ACTIONS

No immediate operator corrective actions were necessary because a release was not in progress at the time SI-410.2 was found to be incomplete. Operations personnel were notified, however, that upper and lower containment compartment samples are required for analysis before conducting purge operations and that SI-410.2 did not properly reflect this requirement.

As corrective actions to ensure the lower and the upper containment compartments will be sampled and analyzed as required by TS SR 4.11.2.1.2, SI-410.2 was revised on March 18, 1988.

The generic issue of identifying similar omissions of TS SR in implementing SIs is addressed by the SI-1 review process. Incomplete or incorrect applications of TS SR are identified either during SI change reviews, as was the incomplete sampling requirements in this report, or via a biennial audit of each SI using SI-1, Appendix F, in accordance with Administrative Instruction (AI)-4, "Preparation, Review, Approval and Use of Site Procedures/Instructions."

An investigation is in progress to determine if a generic weakness exists in the SI-1, Appendix F review process that has allowed previously identified oversights to be made during the initial SI-1, Appendix F review. This investigation will be completed by May 15, 1988. Appropriate corrective actions will then be taken based on the investigation conclusions.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (if more space is required, use additional NRC Form 366A's) (17)

## ADDITIONAL INFORMATION

There have been 24 previously reported occurrences of incomplete implementation of TS SRs within the surveillance program. Seventeen of these reports were due to findings identified by the SI-1, Appendix F review process -

SQRO-50-327/84071, 86007, 86012, 86013, 86023, 86027, 86030, 86035, 86039, 86042, 86044, 86050, 86052, 87006, 87007, 87008, 87014, 87017, 87018, 87022, 87028, 87059, 87075, and 88013.

Two of these 24 reports were due to findings made in SIs that had previously been reviewed using SI-1, Appendix F.

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TENNESSEE VALLEY AUTHORITY  
Sequoyah Nuclear Plant  
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April 11, 1988

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

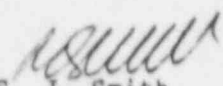
Gentlemen:

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - DOCKET  
NOS. 50-327 AND 50-328 - FACILITY OPERATING LICENSE DPR-77 AND DPR-79 -  
REPORTABLE OCCURRENCE REPORT SQRO-50-327/88015

The enclosed licensee event report provides details concerning a technical  
specification surveillance requirement not properly implemented for sampling  
containment before performing containment purge operations due to an  
incomplete procedure review. This event is reported in accordance with 10  
CFR 50.73, paragraph a.2.i, as a condition prohibited by technical  
specifications.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
S. J. Smith  
Plant Manager

Enclosure  
cc (Enclosure):

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NRC Inspector, Sequoyah Nuclear Plant

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