

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

March 19, 1982

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U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

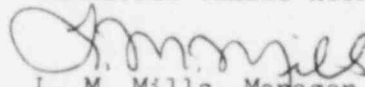
Dear Mr. O'Reilly:

This is in response to R. C. Lewis' February 22, 1982 letter to H. G. Parris, Report Nos. 50-259/82-01, -260/82-01, and -296/82-01, concerning activities at the Browns Ferry Nuclear Plant which appeared to violate NRC requirements. Enclosed is our response to Appendix A, Notice of Violation. If you have any questions, please call Jim Domer at FTS 858-2725.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/82-01, 50-260/82-01, AND 50-296/82-01
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED FEBRUARY 22, 1982

Appendix A - (259/82-01-01)

Technical Specification 3.2.b requires the limiting conditions for operation for the instrumentation that initiates or controls the core and containment cooling systems as given in Table 3.2.B. Table 3.2.B requires that there shall be minimum of two operable channels per trip system for Pressure Switches PS-64-58A thru D.

Contrary to the above, the requirement that there be two operable channels per trip system for PS-64-58 was not met in that on January 6, 1982, at 1330 it was determined by the resident inspector during a routine tour of the Reactor Building that PS-64-58C had it's associated isolation valve shut rendering the switch inoperable, thus having only one channel operable in one trip system.

This is a Severity Level IV Violation (Supplement I.1.2.).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

On January 4, 1982, assigned instrument maintenance personnel performed Surveillance Instruction (SI) 4.2.B-5, Drywell High-Pressure Switches PS-64-58(A-D). All SI steps were signed off as completed, including step 4.11 for PS 64-58C, verifying the isolation valve was opened. Statements from the two senior instrument mechanics involved in the calibration related that the valve in question was verified to be opened by the three instrument mechanics working at the valve's instrument panel.

As a result of an in-depth investigation, it was concluded that this valve could have been: (1) left closed during performance of the SI related to the switch or (2) closed during performance of another SI which was performed at the panel later in the day on January 4, 1982.

3. Corrective Steps Which Have Been Taken and the Results Achieved

The unit 1 instrument foreman and the assistant instrument maintenance supervisor were immediately notified of the valve closure and went to panel 25-6 and opened the instrument isolation valve and verified proper valve alignment for companion switches.

On January 7, 1982, an independent verification of all the isolation and drain valve alignment on panels 25-5, 25-6, 25-51, 25-52, 25-7, and 25-56 was performed on units 1 and 2. Unit 3 remained in refueling outage. No anomalies on isolation or drain valve alignment were found during this verification.

Responsible foremen were then instructed that subsequent to the performance of any SIs in which valving alignment could not be verified from the control room, they were to inspect and verify that all instruments were properly returned to service.

A review of instrument mechanic valving errors for 1980-81 was made. The individuals involved in this incident were not involved in any identified valving errors during that period.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

A review of the instrument surveillance tests which involve valve manipulations during SI performance will be made and those which do not have control room indication of the instrumentation being in service (i.e., annunciator, indicator, or recorder) will have a separate verification of correct valve alignment following performance. The SIs affected will have a step added for initialed signoff of the verification.

Until the instructions are revised, the instrument foreman will perform a verification of alignment following each SI performance involving valve manipulations in which valving alignment cannot be verified from the control room. This verification will be recorded in the remarks section of the instruction.

Additionally, the installation of cages around and on top of critical plant panels is planned. These cages will be lockable to provide accountability for entry into the panel. An Engineering Change Notice ECN (P0039) for this work has been issued by the Division of Engineering Design and drawing release is expected in the near future.

5. Date When Full Compliance Will Be Achieved

All procedure changes will be accomplished by May 1, 1982. The panel cage modification has been factored into the overall Browns Ferry commitment integrated schedule which was presented to NRC-NRR in the fall of 1981 and was subsequently formally submitted to NRC on October 28, 1981, by letter from L. M. Mills to H. R. Denton and will be worked accordingly. We estimate completion based on that schedule to be fall 1984.