

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

April 23, 1982

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

Dear Mr. O'Reilly:

This is in response to R. C. Lewis' March 20, 1982 letter to H. G. Parris, Report Nos. 50-259/82-06, -260/82-06, -296/82-06, concerning activities at Browns Ferry Nuclear Plant which appeared to violate NRC requirements. Enclosed is our response to Appendix A, Notice of Violation.

TVA's actions taken to improve the effectiveness of our management control systems are as follows.

Over the last six to eight months, TVA has expended considerable effort in improving performance in several areas. Two of these areas are directly applicable in improving management control systems. These are as follows.

1. Supervisory involvement, at all levels, in plant operation.
2. Professionalism and professional discipline among operator and craft personnel.

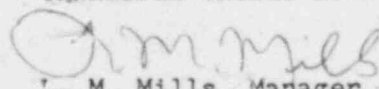
Browns Ferry management has been active in improving performance in these two areas. It must be recognized that program improvements such as these may take considerable time to show marked improvement. However, we believe that our success in this effort is becoming evident. This has been shown in part by no violations cited by NRC for the months of February and March 1982 for failure to follow procedures. We expect this improvement to continue although there may be isolated instances of such violations. However, these should not be due to failures of management control systems. If failures or degradation in management control systems occur, we will take prompt action.

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 Licensing

Enclosure

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RESPONSE - NRC INSPECTION REPORT NOS.
50-259/82-06, 50-260/82-06, AND 50-296/82-06
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED MARCH 24, 1982

Appendix A

Item A - (259/82-06-04)

10 CFR 50.59 (b) requires that the licensee shall maintain records of changes in the facility to the extent that such changes constitute changes in the facility as described in the safety analysis report. These records shall include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, the requirements that a safety evaluation be performed on changes to the facility as described in the safety analysis report Section 9.3-1B was not met in that on January 7, 1982 a flush hose was installed on the drain line from the 1.75 minute off gas holdup volume to the off gas condensate sump without a maintenance request (MR) form, a temporary alteration control form (TACF) or a written safety evaluation. This modification resulted in a release of airborne activity in the radwaste building and the service building on January 10, 1982.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Personnel involved reacted to what they considered an emergency without properly complying with plant administrative controls.

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

On January 11, 1982, the temporary flush hose was removed from the off-gas holdup volume drain line.

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

Plant procedures are being revised to more accurately reflect the requirements of 10 CFR 50.59. Licensed operators will cover this event, including details of the violation, in operator training.

5. Date When Full Compliance Will Be Achieved

Procedure revisions will be completed before June 1, 1982.
Retraining will be conducted by July 1, 1982.

Item B - (259/82-06-03, 260/82-06-03, 296-82-06-03)

10 CFR 50.55a, (g)(4) requires in part that, "throughout the service life of a boiling. . .water cooled nuclear power facility, components which are described as ASME Class 1, 2, and 3. . .shall meet the requirements set forth in Section XI of editions of the ASME Boiler and Pressure Vessel Code. "Section XI of the ASME Boiler and Vessel code requires that Category A and B valves shall be stroke time tested.

Contrary to the above, the requirements of ASME Section XI for stroke time testing of Category A and B, class 1, 2, and 3 valves, have not been met in that two primary containment Group 6 isolation valves for the containment atmosphere dilution system (FCV 84-19, FCV 84-20) have not been stroke time tested.

This is a Severity Level V Violation (Supplement I.E.). This is applicable to all units.

1. Admission or Denial of the Alleged Violation

TVA admits to a violation of technical specifications. Neither of these valves is included in the ASME Section XI program for Browns Ferry, and in accordance with various correspondence received from NRC, they are not required to be part of the ASME Section XI program. Failure to stroke time test FCV 84-19 and FCV 84-20 does not therefore constitute a violation of the requirements of ASME Section XI. However, Technical Specification 4.7.D.1.a requires that at least once per operating cycle, isolation valves that are power operated and automatically initiated be tested for simulated automatic actuation and closure time. Failure to test FCV 84-19 and 84-20 in this matter did constitute a violation of Technical Specification 4.7.D.1.a.

2. Reasons for the Violation if Admitted

FCV 84-19 and FCV 84-20 are 2-inch primary containment vent valves to the standby gas treatment system which are key interlocked and normally closed. These valves were apparently inadvertently omitted in initial preparation of Technical Specification Table 3.7.A and were subsequently not included in the associated surveillance instruction (SI). This resulted in the valves not being closure-time tested as required by Technical Specification 4.7.D.1.a.

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

See response to item 4.

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

The associated SI will be revised to include the requirement for closure-time testing of FCV 84-19 and FCV 84-20. Revisions to Technical Specification Table 3.7.A will also be submitted.

5. Date When Full Compliance Will Be Achieved

The SI will be revised by May 14, 1982. This will effectively prevent recurrence of the violation. A revision to Technical Specification Table 3.7.A will be submitted. However, achieving compliance with Technical Specification 4.7.D.1.a will be satisfied by the SI revision and will not be dependent upon receipt of an approved revision to Technical Specification Table 3.7.A.

Item C - (259/82-06-01, 260/82-06-01, 296/82-06-01)

Technical Specification 6.3.a requires that detailed written procedures be prepared, approved, and adhered to for radiation control, maintenance operations, and surveillance instructions.

Contrary to the above, detailed written procedures were not adhered to in that:

1. On December 29, 1981 the 1-B containment atmospheric monitor (CAM) pump was disconnected and removed from the CAM system without the issuance of a special work permit (SWP) as required by Radiological Control Instruction (RCI)-10 when the contamination hazards for a particular job are unknown.
2. As of January 8, 1982 the inspector identified that the five year inspection of flood protection devices was not conducted as required by Mechanical Maintenance Instruction 19.
3. On January 7, 1982 two workers entered a radiation area to install scaffolding without an approved SWP as required by RCI-10, Section V.A.I.
4. RCI-10 Section VIII, paragraph B requires that Special work Permit - Routine (RCI-9) not be used when the area is posted as a special work permit area.
 - a. On December 31, 1981 a Health Physics (H.P.) technician entered the scram discharge instrument volume (SDIV) area without signing in on the posted SWP for that area. The H.P. technician signed in on a SWP-Routine.

- b. On January 18, 1982, a H.P. technician monitoring the installation of the equipment drain pump for Unit 2, on 519 level, North East quadrant entered without signing in on the posted SWP for that area. He signed in on the SWP-Routine.
5. While performing Surveillance Instruction (SI) 4.2.C.8, "Instrumentation That Initiate Rod Blocks Rod Sequence Control Restraints, First Stage Turbine Pressure," on January 1982, the following procedure steps were not adhered to:
 - a. Step 4.1.c specified use of a 200 psi test gauge. A 500 psi test gauge was used.
 - b. Step 4.2.a requires a digital voltmeter to be used. A volt-ohm meter was used.
 - c. Step 4.2.a requires connecting the digital voltmeter to terminals 5 and 6 of the alarm unit. The digital voltmeter was connected to terminals CC79 and CC84.

This is a Severity Level V Violation (Supplement I.E.) and is applicable to all three units.

Response

Example 1

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The foreman who worked on the containment atmosphere monitor had received verbal approval from a health physics (HP) representative to replace the pump without issuance of a special work permit. The HP technician made the decision to allow work based on previous radiation surveys.

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

All sections involved have been made aware of the radiological implications of replacing these pumps. Signs have been placed on the containment atmosphere monitor panels which caution the worker to contact HP before opening the system. No further events of this type have occurred since these actions were implemented.

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

This event will be discussed with electricians and electrician foremen in safety meetings.

5. Date When Full Compliance Will Be Achieved

Awareness discussions will be completed by May 1, 1982.

Example 2

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

An extensive search was made to locate Mechanical Maintenance Instruction (MMI) 19 data to prove performance of the 5-year inspection of flood protection devices. The data could not be found and is presumed lost. It is believed that the instruction was last performed in 1978 based on discussions with plant personnel.

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

The inspection is currently being performed and the expected completion date is April 30, 1982. The periodic scheduled maintenance program has been revised to include MMI-19. Mechanical Maintenance Section Instruction Letter 48 was issued on June 4, 1981, which specifies control of quality assurance records and will help eliminate similar occurrences.

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

Records will be handled as quality assurance documents and submitted to permanent record storage as specified by plant procedures and implemented in Mechanical Maintenance Section Instruction Letter 48.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by April 30, 1982, when MMI 19 is completed.

Example 3

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons For The Violation if Admitted

The incident occurred during a HP shift change. The newly arrived HP technician mistakenly assumed a general area SWP was in effect. The two workers wishing to install scaffolding were told to sign in on the general area SWP. The workers signed in on a SWP which was valid only for passage through and not for work in the area where the scaffold was to be erected. The violation occurred because of insufficient communications during HP shift turnover and failure of the workers to adequately read the SWP restrictions.

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

The situation was discussed with the HP personnel involved. They were advised that they must be familiar with a control point before assuming control. Additionally, a memorandum has been issued to all HP shift supervisors requiring that they make all HP technicians aware of the need for a comprehensive turnover. Mechanical maintenance management also discussed the incident with the foreman of the personnel involved and emphasized the need to comply with SWP restrictions.

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

The corrective action taken is considered adequate.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 13, 1982, with issuance of the memorandum on shift turnover.

Example 4

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons For The Violation if Admitted

The two HP technicians involved were signed in on an SWP written for HP surveys and believed they were in compliance. They failed to realize that they were required to sign in on the SWP specifically issued for the job.

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

A memorandum was written to all HP shift supervisors reminding them that the use of the SWP routine is not allowed when there is a valid SWP in effect for the job. Radiological incident reports were written against the two technicians involved. Additionally, a letter of reprimand has been issued against the shift supervisor of the individual involved in the January 18, 1982 incident.

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

The corrective action taken is considered adequate.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 14, 1982 with issuance of the letter of reprimand.

Example 5

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons For The Violation if Admitted

- (a) A 500-psi test gauge is used in SI 4.2.C-8 section 4.4. It was mistakenly used in step 4.1.c; however, the 500-psi gauge is within the required accuracy.
- (b) (Note: This is step 4.3.a instead of step 4.2.a.) This step is used to verify contact position. It is standard practice to use a volt ohm meter (VOM) for this verification.
- (c) (NOTE: This is step 4.3.a instead of step 4.2.a.) Terminals 5 and CC84 are the opposite ends of one contact wire. Likewise, terminals 6 and CC79 are the opposite ends of the other contact wire. Since Figure 1 of SI 4.2.C-8 details this arrangement it was believed this was allowed and within the bounds of the procedure.

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

SI 4.2.C-8 was revised for clarification in step 4.3.a to allow use of a VOM and monitoring of CC79 and CC84 for contact position. Personnel were instructed to use the 200-psi gauge for step 4.1.c.

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

Personnel were cautioned to pay particular attention to details of procedures.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 9, 1982, when a revision to SI 4.2.C-8 was issued.