

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II
NRC REGION II
ATLANTA, GEORGIA

May 17, 1982 82 MAY 24 A 8 : 24

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

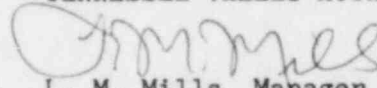
Dear Mr. O'Reilly:

This is in response to R. C. Lewis' April 15, 1982 letter to H. G. Parris, Report Nos. 50-259/82-12, -260/82-12, and -296/82-12, concerning activities at the Browns Ferry Nuclear Plant which appeared to violate NRC requirements. Enclosed is our response to Appendix A, Notice of Violation and Appendix B, Notice of Deviation. If you have any questions, please call Jim Damer 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

ENCLOSURE
RESPONSE - NRC INSPECTION REPORT NOS
50-259/82-12, 50-260/82-12, AND 50-296/82-12
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED APRIL 15, 1982

Appendix A

Item A - (259/82-12-06)

10 CFR 50, Appendix B, Criteria V as committed to in TVA Topical Report (TR75-1), paragraph 17.2.5 requires that activities affecting quality be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, the requirement that activities affecting quality be prescribed by documented instructions or procedures of a type appropriate to the circumstances was not met in that on March 17, 1982 it was determined that the outer Reactor Core Isolation Cooling (RCIC) exhaust rupture disc was not installed. The licensee could produce no documentation showing that the outer rupture disc had been worked on. The outer rupture disc was last known to have been installed in April, 1980. The inner rupture disc was replaced in April 1980 and June 1981. The work instructions for both these work activities did not discuss how to replace the inner rupture disc or the type inspection to be made after completion of work.

This is a Severity Level IV Violation (Supplement I.D.3) and is applicable to Unit 1.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

When a modification to replace the inner rupture disc was performed in June 1981, the outer rupture disc was not in place. The work instruction provided no written work instructions and the drawings included in the work instruction did not reflect the configuration of the inner and outer rupture discs. Normally the rupture discs were changed out as routine maintenance and field services employees had little experience with the evolution and, due to lack of adequate documentation, failed to install an outer rupture disc.

3. Corrective Steps Which Have Been Taken and Results Achieved

The rupture disc has been assembled correctly.

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

The work instruction for performance of this work was prepared in April 1980 and performed and reviewed by June 1981. Since that time much more emphasis has been placed on reviewing workplans for adequate work instructions and references. Mechanical Maintenance Instruction 22 will be revised to clarify installation instructions for the RCIC rupture disc.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by August 1, 1982.

Item B - (260/82-12-03)

Technical Specification 4.6.H.1 requires that snubbers be inspected in accordance with previous snubber history operability; specifically if one snubber is found inoperable during an inspection, the next snubber inspection shall be scheduled for a 12-month interval.

Contrary to the above, the requirement to schedule a snubber inspection for a 12-month inspection interval when one snubber was previously found inoperable was not met in that during the Unit 2, May 23, 1979, accessible snubber inspection, one snubber was found to be inoperable. The next snubber inspection was conducted October 17, 1980, during the Unit 2 outage approximately 17 months later.

This is a Severity Level V Violation (Supplement I.E.) and applies to Unit 2.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Apparently the surveillance instruction (SI) cover sheet for inaccessible snubber surveillance was stapled over the cover sheet for accessible snubber data, and the SI scheduler failed to note that a frequency change was to be implemented for accessible snubbers.

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

Additional manpower has been assigned to monitor and schedule SI data received. The SI schedulers have been alerted to the two types of cover sheets applicable to this SI and the ease in which oversights can occur.

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

The SI data cover sheets for SI 4.6.H.1 will be revised to more explicitly denote when a frequency change is to be implemented. A note will be added to the SI relating to not fastening accessible and inaccessible information together.

5. Date When Full Compliance Will Be Achieved

Revisions to the SI and data cover sheets will be implemented by June 30, 1982.

Item C (259, 260, 296/82-12-01)

Technical Specification 6.3.A requires that detailed written procedures be prepared, approved and adhered to for radiation control and surveillance requirements.

Contrary to the above, the requirement that detailed written procedures be approved and adhered to was not met in that:

- (1) On March 17, 1982 the inspector determined that Operating Instruction (OI)-77, Operation of Radwaste, being used by the radwaste operator, was not of the latest approved revision issued on February 9, 1982.
- (2) During a review of SI 4.6.H on March 18, 1982, it was noted that no inspection criteria guidelines were given to correct deficiencies found during snubber inspections.

This is a Severity Level V Violation (Supplement I.E.).

C.1

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The latest revision of OI-77, Operation of Radwaste, was not available to the radwaste operators because the procedure was not on the working file distribution list for receipt of current procedure changes.

3. Corrective Steps Which Have Been Taken and Results Achieved

Upon discovery of the incident, the latest revision of OI-77 was immediately copied and placed in radwaste. This and other procedures necessary for operation of radwaste have been placed on the document control working file distribution list.

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

As revisions are made to the procedures, copies of applicable operating instructions that are to be used as working copies will be continually updated by the operations clerk.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved. The latest revision of OI-77 was placed in radwaste by March 18, 1982 and the necessary operating instructions were added to the working file distribution list by March 30, 1982.

C-2

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The surveillance instruction does not provide inspection guidelines or replacement criteria because normally any leakage or other problems are corrected at the time or the snubber is replaced. In cases where replacement snubbers or parts are not immediately available, reinspection criteria or replacement criteria would be needed.

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

The snubber noted was pulled, replaced, and tested and was determined to be operable.

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

Surveillance Instruction 4.6.H will be revised to adequately address inspection guidelines or replacement criteria for problems associated with oil leakage, damaged parts, cylinder rod condition, and tightness of lock nuts and mounting eyes.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by August 31, 1982.

Appendix B

Notice of Deviation (259/82-12-04)

Based on the results of the NRC inspection conducted on February 26 - March 25, 1982, certain of your activities appear to deviate from your commitments to the Commission as indicated below:

L. M. Mills' letter of December 7, 1981 to the Nuclear Regulatory Commission responding to Inspection Report 81-19, item 27, committed to update Muscle Shoals Emergency Control Center Implementing Procedure 10 by February 2, 1982.

Contrary to the above, a review of records on February 19, 1982 indicated no change had been made to MSECC IP-10.

Corrective Actions That Have Been or Will Be Taken

Upon discovery that the due date of February 2, 1982 was not met, a letter was sent from L. M. Mills to the Nuclear Regulatory Commission dated March 11, 1982. This letter stated that Muscle Shoals Emergency Control Center Implementing Procedure 10 was revised on March 2, 1982 to incorporate protective action guides as required by Inspection Report 81-19, Item 81-19-27. This resolved the original commitment. The revision commitment date was missed due to delays encountered while attempting to include other major changes in the procedure and failure to request an extension of the commitment date.

The letter of March 11, 1982 also described an additional revision to MSECC IP-10 to include a detailed protective action logic diagram by May 1, 1982.

Corrective Action Which Will Be Taken to Avoid Further Violations

The Division of Nuclear Power has combined all identified commitment actions into a single computerized Commitment Control System. The new system places emphasis on positive identification, resolution and awareness by all levels of management of such findings. Since the system is new, major emphasis is being placed on obtaining the status of old items as well as verifying that new items are entered. Once fully implemented, this system will play a major role in ensuring that actions are completed before the commitment due date.

Date Corrective Actions Were or Will Be Completed

The original commitment was completed on March 2, 1982. The Commitment Control System became effective on March 5, 1982 when DPM N82A3 was approved. The additional revision to MSECC IP-10 was completed on April 27, 1982.