

TENNESSEE VALLEY AUTHORITY
USNRC REGION II
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II
ATLANTA, GEORGIA

May 17, 1982 82 MAY 24 A 8: 27

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

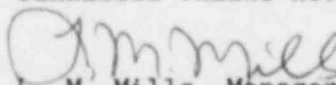
Dear Mr. O'Reilly:

This is a supplemental response to R. C. Lewis' January 21 and March 15, 1982 letters to H. G. Parris, Report Nos. 50-259/81-37, -260/81-37, and -296/81-37, concerning activities at the Browns Ferry Nuclear Plant which appeared to violate NRC requirements. Our initial response was provided in my March 3, 1982 letter to you. 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.
50-259/81-37, 50-260/81-37, AND 50-266/81-37
R. C. LEWIS' LETTERS TO W. G. PARRIS
DATED JANUARY 21, 1982 AND MARCH 15 and 18, 1982

Appendix A

Technical Specification 6.3.a requires that detailed written procedures shall be prepared, approved, and adhered to for radiation control and operation of systems involving nuclear safety of the facility.

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

1. System Operating Instruction (OI)-77, Operation of Radwaste Disposal System, could not be used as written for recirculating the laundry drain tanks because of a modification performed on the system several years ago and not incorporated into the procedure. In addition, six valves were out of position as compared to the normal valve lineup and one valve which was not on the normal valve lineup but was out of position as compared to the system drawing.
2. Containment Atmosphere Dilution Operating Instruction (OI-34) could not be used as written because the procedure referenced incorrect override locations and omitted required hand switch manipulations thus making the system operation not possible if procedural adherence was obeyed.

This is a Severity Level IV Violation (Supplement I.D.3.).

Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Example 1

- a. The laundry drain tank recirculation piping was modified under workplan 8273 and the modification completed in August 1979. The modification was performed to allow recirculation through the laundry drain filter before sampling. The modification did not add or delete any valves or active components in the system; however, it did require a change to Operating Instruction (OI) 77 to open the filter inlet valve before recirculation. The change was not made to OI-77 as required.

- b. The six valves that were found out of position as compared to the valve checklist were components of the laundry drain system, radwaste evaporator system, clean radwaste processing system, and in the radwaste discharge to the cooling tower blowdown. Three of the valves were out of position with respect to the valve checklist to perform specific operations as described in OI-77. Two of the valves were out of the standby readiness position because the radwaste evaporator system was not in service. The valve in the radwaste discharge system line to the cooling tower blowdown was out of the standby readiness position because the cooling towers were not in service in the closed mode, and discharge from radwaste to the cooling tower blowdown line was not desirable. However, an abnormal status sheet was not placed in the valve checklist file as required by Operations Section Instruction Letter (SIL) 21.

The valve checklist was intended to align the system to the standby readiness condition per the design drawings and was not intended to provide alignment for all modes of system operation. The valve alignments for the modes are included in the operating instruction.

- c. The valve that was not on the valve checklist was 77-884. It is assumed that this was a typographical error. However, OI-77 does address the use and position requirements of this valve on pages 33 and 34.

In summary, TVA's position regarding this example of the violation is as follows:

1. The valves which were "out of position" were in reality in the proper position regarding operation of the particular subsystem, the positions were known to the operators, and the valves were in this position in accordance with the text of the operating instructions. Because of the nature of radwaste operations at Browns Ferry (a continuous cycling between collection in a tank and discharge of the tank, with only a brief 30- to 60-minute recirculation-sample cycle in between), it is not necessary or practical to restore the system to standby readiness "on paper" after each subsystem operation.
2. TVA does concur that one valve was not on the valve checklist, one valve was out of position as required by the valve checklist, and the OI was out of date regarding the manipulation of recirculating the laundry drain tank.
3. There were weaknesses in procedural discipline in our radwaste operations. This has been cited by NRC since this violation and additional corrective measures have been taken as described under item 4 below.

Example 2

The Containment Atmosphere Dilution (CAD) System Operating Instruction (OI-34) had deficiencies which occurred primarily because of the modification made as a result of a requirement (NUREG-0578) regarding reset of containment isolation signals.

The initial TVA approach to this modification was found not acceptable to NRC during a postimplementation review, and the system was required to be modified a second time. At some stage of these modifications, the required changes were not made to the operating instructions.

3. Corrective Steps Which Have Been Taken and Results Achieved

Example 1

OI-77 has been revised to correctly include all modification changes performed under workplan 3278.

A new valve checklist has been run on radwaste systems to ensure proper alignment of all valves listed in the valve checklist. However, as discussed above, the system alignment during any given evolution will be in accordance with the procedure and may deviate from the valve checklist. In addition, valve 77-304 was added to the valve checklist.

Example 2

OI-84 has been revised to include correct switch manipulation and switch locations for venting containment. OI-84 was changed initially after identification of the problem by the inspector, but further drawing review has concluded that the initial change was not sufficient.

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

Examples 1 and 2

Before the violation, Operations SIL 94 was issued to inform operators of the need to identify procedure errors and ensure they are corrected. At that time, only licensed operators were on the reading list for procedural changes (which included SIL-94). Since that time, the unlicensed assistant shift engineer assigned to radwaste operations has been added to this list. Additionally, the requirements of SIL-94 have been discussed with this individual.

5. Date Full Compliance Will Be Achieved

Example 1

Corrective actions as described in item 4 above were completed on or before April 15, 1982.

Example 2

Procedure changes were completed on March 30, 1982.

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