

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

APR 9 8 42  
April 6, 1982

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

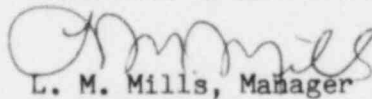
Dear Mr. O'Reilly:

This is in response to F. S. Cantrell's February 23, 1982 letter to H. G. Parris, Report Nos. 50-259/82-04, -260/82-04, and -296/82-04, concerning activities at the Browns Ferry Nuclear Plant which appeared to violate NRC requirements. Enclosed is our response to Appendix A, Notice of Violation. As of March 8, 1982, TVA had not yet received this report. As discussed with Austin Hardin of your staff on March 8, TVA was granted until April 8, 1982 to submit this response. 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.  
50-259/82-04, 50-260/82-04, AND 50-296/82-04  
F. S. CANTRELL'S LETTER TO H. G. PARRIS  
DATED FEBRUARY 23, 1982

Appendix A - (259/82-04-01, 296/82-04-01)

10 CFR 50, Appendix B, Criterion V as implemented by TVA Topical Report TVA-TR 75-01, paragraph 17.2.5 requires activities affecting quality be accomplished in accordance with procedures. TVA N-OQAM, Part II, Section 6.3, paragraph 2.4 requires NDE personnel to enter their level of certification on nondestructive examination reports. TVA Procedure MAI-21 "Control of Torus Modification Activities," dated April 15, 1981, Appendix B, paragraph 3.3 requires welding electrodes to be maintained in electrode ovens separated by heat number.

Contrary to the above, on January 27-29, 1982, activities affecting quality were not accomplished in accordance with procedures in that:

1. A number of nondestructive examination reports did not identify the level of certification (Level I, II, or III) of the NDE personnel performing the examination.
2. Type E-309-15 welding electrodes from two different batches/lots/heats were mixed together in one compartment of an electrode oven in the Unit 3 torus welding electrode issue station.

This is a Severity Level VI Violation (Supplement I.F).

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 inspection form in Division Procedure Manual (DPM) N80E3 did not have a place for certification level.

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

The forms in Quality Assurance Section Instruction Letter (QA SIL) 10.2 have already been revised to include this requirement and are being used. The division level document (DPM N80E3) has been revised to include this requirement and will be issued by April 30, 1982.

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

Use of correct forms will prevent further violations.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 17, 1982, with revision of the forms in QA SIL 10.2 which are used by the inspectors during the performance of NDE inspections.

Example 2

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

There were approximately 13 electrodes which were retrieved from the rod oven which were stamped with heat numbers different from the majority of the rods in the oven. The tool clerks were aware of the situation of two different heat numbers and made it a practice to physically segregate the rods. The clerks were negligent in maintaining these rods separately and there were no means other than taping them or wrapping them to keep them physically segregated. As a new rod batch was broken out, the pile rolled on top of the old heat number rods; and since they were not wrapped, the old rods' identities were lost.

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

A survey was immediately conducted in the torus rod oven and approximately 13 rods were recovered, taped, and segregated until issued and used. Two rods that were confiscated were destroyed. A total of 36 sheet metal pans was made to keep the rods physically segregated in order to avoid the rods meshing together and their identity being lost. The rod trays were temporarily labeled with size, type, and heat number. The tool clerks involved were issued a verbal warning for failure to carry out their duties properly in maintaining physical segregation of the rods.

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

The pans should avoid recurrence of this type. All clerks will be briefed on the possibility of mixing of rods when changing electrode batches. Additionally, outside the oven there is a diagram of the rod oven which clearly displays the tray arrangement.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by April 15, 1982, when the documenting of the verbal warning and the permanent stenciling of all rod oven trays will be completed.