

USNRC RE TENNESSEE VALLEY AUTHORITY
ATLANTA, GEORGIA CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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April 21, 1983

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

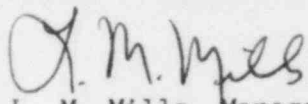
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' March 16, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-05, -260/83-05, -296/83-05 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our response to Appendix A, Notice of Violation. A six-day extension on the submittal of this response was discussed with Ross Butcher of your staff on April 18, 1983. 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.
50-259/83-05, 50-260/83-05, AND 50-296/83-05
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED MARCH 16, 1983

Appendix A

Item A - (296/83-05-02)

10 CFR 50, Appendix B, Criterion V as implemented by TVA's QA Topical Report, TVA-TR75-1, paragraph 17.2.5, requires that activities affecting quality be prescribed by procedures appropriate to the circumstances and be accomplished in accordance with those procedures.

Contrary to the above, the requirement was not met in that the maintenance work on January 20, 1983, on Unit 3 Residual Heat Removal Valve 74-53, did not return the motor operator electrical conduit mounting supports to its designed configuration. Conduit mounting supports were not reinstalled at the completion of the maintenance. The work instructions did not discuss how to remount the conduit or the type inspection to be made after completion of work.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The conduit work was performed in support of valve maintenance work and the electricians removed a piece of unistrut on the wall in preparation for disassembly of the valve. The location of the unistrut did not catch the attention of the craftsmen or engineer on valve reassembly. The work area was inspected after the work and this was not detected.

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

The conduit mounting supports have been connected to the conduits and are supported per General Construction Specification G-3.

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

This is considered an isolated incident and no recurrence control is required. This matter will be discussed with Field Services foremen and engineers illustrating the need for more attention to the work area before and after work is completed.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 19, 1983 when the conduit mounting supports were reinstalled.

Item B - (296/83-05-04)

Technical Specification 6.3.A.6 requires that detailed written procedures shall be adhered to for surveillance and testing requirements. Surveillance Instruction 2 (SI-2), Instrument Checks and Observations, requires that the operating status of the turbine building exhaust fans shall be appropriately recorded on the SI-2 Radiation Recorder Log Sheet.

Contrary to the above, the requirement was not met in that the operating status for turbine building Unit 3 exhaust fans E, F, G, H, and J was not accurately recorded. From February 13-17, 1983, fans E, F, G, H, and J were recorded as being "ON" when actually they had been secured and tagged off since November 1982.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The turbine building log sheet used by the assistant unit operator (AUO) to record the information required by SI-2 was not detailed enough to determine the fan status when transferring the information to the SI-2 data sheet.

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

The turbine building log sheet has been revised to provide sufficient detail to record the actual status of each fan.

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

Not required.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 23, 1983, when the new turbine building log sheet was put into use.

NRC Concern

In addition to the need for corrective action regarding the violations in Appendix A, we are concerned about the implementation of your management control systems that permitted their occurrence. Consequently, in your reply, you should describe, in particular those actions taken or planned, to improve the effectiveness of your management control systems with respect to Violation B. This is the third violation involving Surveillance Instruction (SI) 2 within the past six months.

TVA Response

Because of past problems with SI-2, TVA initiated a comprehensive review which involved senior management and licensed senior reactor operators. This review, which focused upon changes considered essential and desirable by plant operating personnel, has been completed and a major revision has been submitted for PORC review and recommended approval. The changes submitted involved dividing shift responsibilities more clearly, expanding data sheets, adding applicable footnotes to each page, and simplifying the review process. These changes should help eliminate future procedural problems.

As stated in our response to your identifying this problem in NRC Inspection Report Nos. 50-259/82-48, 50-260/82-48, and 50-296/82-48, revisions to SI-2 will be completed by April 29, 1983.