

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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February 22, 1983

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

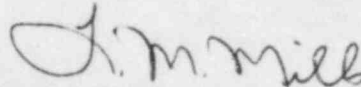
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' January 19, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/82-46, -260/82-46, -296/82-46 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation NRC regulations. We have enclosed our response to Appendix A, Notice of Violation. A two-day extension was discussed with and granted by Inspector Ross Butcher of your staff on February 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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Q PDR

ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/82-46, 50-260/82-46, AND 50-296/82-46
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED JANUARY 19, 1983

Item A (259, 260, 296/82-46-02)

Technical Specification 3.7.E permits reactor operation or refueling operation for a period of 7 days when one of the control room emergency ventilation systems (CREVS) is made or found to be inoperable. Technical Specification 3.7.E.2.b requires the methyl-iodide removal efficiency test on the CREVS charcoal bed filters to be equal to or greater than 90%.

Contrary to the above, the requirement for the charcoal bed filters of the control room emergency pressurization system to have a methyl-iodide removal efficiency of 90% or greater, when the reactor contains irradiated fuel, was not met in that the B train of the control room emergency ventilation system had a methyl-iodide removal efficiency of 79.29%. These test results were documented in Surveillance Instruction 4.7.E.4 on June 21, 1982. No action was taken to replace the ineffective filter bed until December 21, 1982, when identified by the inspector. Units 1, 2, and 3 all contained irradiated fuel sometime during the period June 21, 1982 to December 21, 1982.

This is a Severity Level IV Violation (Supplement I) and is applicable to Units 1, 2, and 3.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The cause of the violation was personnel error. The cognizant reviewer was aware that the test results for methyl-iodide removal efficiency failed to meet technical specification criteria. The reviewer was also aware that, because the sampled filter tray did not meet technical specification limits, the remaining three (unsampled) filter trays were to be considered out of technical specification limits. The cognizant reviewer approved the surveillance instruction (SI) even though only one of the four original filter trays had been replaced with a new tray. The reviewer also failed to initiate paperwork to evaluate the sample's failure to meet technical specification limits for reportability.

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

All four charcoal trays in the unit 3 control room emergency ventilation system were replaced immediately upon discovery that they had not previously been replaced as required by the June 1982 sample results. Charcoal samples were obtained from all four trays and analyzed. Laboratory results confirmed that the three trays that had not been replaced in June 1982 (sample results received) also failed to meet technical specification limits.

Failure to replace the three remaining charcoal trays when the sample results were first received has been discussed with the individual responsible. The necessity of initiating the appropriate evaluation upon notification of charcoal samples that do not meet technical specification limits was also stressed.

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

The charcoal sampling procedure (SI 4.7.E.4) for the control room emergency ventilation system will be revised to require that all four charcoal filter trays be replaced each time the SI is performed. This will help ensure that the system will not contain charcoal that fails to meet technical specification limits.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by March 31, 1983, when the revisions to SI 4.7.E.4 are effected.

Item B

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions and procedures and shall be accomplished in accordance with these instructions and procedures.

- (1) Contrary to the above, the requirement was not met in that completed surveillance tests are required to be reviewed by quality assurance as implemented by Standard Practice 7.4 and Operational Quality Assurance Manual Part II, Section 4.5. SI 4.7.E.4, Control Room Emergency Ventilation System, was not reviewed by QA for the test conducted March 31, 1982.

- (2) Contrary to the above, the requirement was not met in that Mechanical Maintenance Instruction 91, Control Bay Chiller Maintenance, was not conducted at the specified frequency as required by MMI 91 for Units 1, 2, and 3 chillers for the years 1980, 1981 and 1982. The maintenance was performed approximately 25% of the required times.

This is a Severity Level V Violation (Supplement I) and is applicable to Units 1, 2, and 3.

Item B.1 (259, 260, 296/82-46-03)

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The violation resulted from personnel error. The completed surveillance data package was inadvertently placed in the fireproof file cabinet for completed tests and transmitted to lifetime records storage without the quality assurance review and initials/date of plant services personnel.

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

Personnel involved in tracking surveillance test instructions have been instructed to ensure that the test data cover sheets are complete before transmitting the documents to lifetime records storage. The importance of strict adherence to the provisions of Plant Services Section Instruction Letter 21.4 (Schedule System - Technical Specifications Surveillance Tests) has also been stressed.

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

Plant Services Section Instruction Letter No. 21.4 is adequate to prevent any further occurrences. Plant Services supervisory personnel or engineering personnel will provide additional review of the cover sheets for completed surveillance instructions as necessary to ensure compliance with review requirements and schedule change notations.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved February 15, 1983.

Item B.2 (259, 260, 296/82-46-05)

1. Admission or Denial of the Alleged Violation

TVA acknowledges that a violation occurred. The violation is correct as stated for the year 1980 and part of 1981. The requirements of MMI-91 were met for the last half of 1981 and 1982. Apparently, documentation retrieval precluded a thorough audit.

2. Reasons for the Violation if Admitted

TVA failed to perform all of the inspections as required by MMI-91 for the year 1980 and first half of 1981 due to the incompatibility of the initial scheduled inspections and equipment outages.

During the initial inspection effort all documentation was not readily retrievable. The inspector has since reviewed the additional documentation.

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

A review of all data for the years 1980, 1981, and 1982 was made and showed that all of the inspections were made as scheduled for the last half of 1981 and all of 1982. Approximately 30 percent of the required inspections for 1980 and the first half of 1981 were made. Corrective action was taken in 1980 to correct scheduling inadequacies.

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

The maintenance schedule was changed in 1980 to allow for better scheduling of chiller outage. This has corrected problems experienced during the first one and one-half years' performance of MMI-91.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved in July 1981 as evidenced by the data review.