

TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

USNRC REGION II
ATLANTA, GEORGIA

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July 1, 1983

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

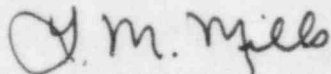
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' May 26, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-15, -260/83-15, -296/83-15 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our responses to Appendix A, Notice of Violation and Appendix B, Notice of Deviation. We discussed the extension to July 1, 1983 in a telephone conversation between Bill Bradford of your staff and Mike Hellums of my staff on June 24, 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

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-15, 50-260/83-15, AND 50-296/83-15
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED MAY 26, 1983

Actions to Improve Management Control Systems - Mechanical-Maintenance

- a. Corrective actions to be taken to assure commitments are tracked and compliance assured.

Presently our plant compliance staff provides tracking mechanisms for ensuring that commitments to NRC and others are tracked until plant procedures are changed or other corrective actions are completed. Success of this effort is evident by our improvement over the past 2-3 years in drastically reducing the number of deviations. However, just revising procedures does not always ensure complete compliance. Scheduling systems should designate which procedures involve commitments so that other considerations, such as manpower or schedule, do not override written commitments. Also, procedures should have a method for distinctively identifying which item(s) are NRC commitments, to preclude the possibility of unconsciously removing commitment items from procedures at a future date.

To this end, Browns Ferry will, to the extent practical, provide the indicators discussed above for previous commitment items in both the schedule system and in plant procedures. This will be based on available records from our computerized tracking system. On a long term basis, the division has and will continue to develop and implement a program matrices system (reference IE Inspection 82-10) to provide an overall, systematic approach to controlling commitments made and implemented in division procedures and instructions.

We will begin this effort in the mechanical maintenance area, and extend to other areas in the near future. In addition, as soon as plant procedures can be revised unique identifiers for new NRC commitments will be introduced into both our schedule system and in the procedures themselves.

Also, mechanical maintenance personnel have recently completed a detailed review and revision of the scheduled maintenance system to ensure that all items are allotted adequate time for completion and are properly sequenced.

- b. Corrective actions to be taken to correct potential loss in reliability of RHRSW system due to repetitive failures of RHRSW air vacuum valves.

We believe the specific items regarding the RHRSW system have been adequately addressed in our response to both this report and in our revised response to report No. 81-28.

- c. Corrective actions to assure communication/procedures are clarified between maintenance and operational areas.

All mechanical maintenance instructions will be reviewed to ensure proper communications are established to prevent bypassing inspections, etc.

- d. Management attention to be taken that will assure compliance and increased plant safety reliability.

Based on perceived NRC concerns regarding responsiveness and attention to possible safety problems, we very recently have added to the activities covered in our Daily Coordination Meeting a list of open NRC concerns. This has been effective in minimizing open items, correcting potential problems, and increasing both compliance and reliability.

Also, we have recently relocated an experienced engineer from our mechanical maintenance section to our compliance staff. One of this engineer's primary functions is to assist mechanical maintenance personnel regarding regulatory compliance and to provide a more independent look at mechanical maintenance activities. However, this personnel move has created a greater shortage in our mechanical maintenance section. One of our most immediate needs is filling the existing engineering vacancies in this section and will be given increased management attention. In addition, we are upgrading the qualifications of both management and engineering personnel in this section through shift technical advisor (STA) and senior reactor operator (SRO) certification training.

Appendix A

Item A - (259, 260, 296/83-15-02)

Technical Specification 6.3.A requires that detailed written procedures shall be prepared, approved, and adhered to as related to surveillance and maintenance procedures.

Contrary to the above, this was not met in that review of Surveillance Instruction 4.5.C.2, RHRSW Functional Test, of March 23, 1983, indicated that the required step 1.1, performance of Mechanical Maintenance Instruction 29, Inspection of RHRSW Pump Operation, was not conducted.

This is a Severity Level V violation (Supplement I). (This 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 reason was procedural inadequacy. SI-4.5.C.2 and SI-4.5.C.3 previously did not require a sign-off by mechanical maintenance saying that applicable portions of MMI-29 have been performed or did not require a listing of the person's name notified. All that was required was that the operator notify mechanical maintenance that SI-4.5.C.2 and SI-4.5.C.3 were being performed.

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

The instructions and data sheets of SI-4.5.C.2 and SI-4.5.C.3 have been revised to ensure proper notification of the responsible maintenance supervisor on duty, to ensure the listing of the person's name that was notified, and to provide a sign-off on respective data sheets stating that mechanical maintenance has performed applicable portions of MMI-29.

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

The completed MMI and SI data will be examined to verify compliance with the revisions made.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved when SI-4.5.C.2 and SI-4.5.C.3 were revised on May 2, 1983.

Item B - (259, 260, 296/83-15-03)

10 CFR 50, Appendix B, Criterion V states in part that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Contrary to the above, this was not met in that review of Electrical Maintenance Instruction (EMI) 57, HPCI Level Switch Calibration, indicated the procedure, as written, was inadequate. Figure 1 of EMI 57 which denotes system test configuration, is unusable since the water fill line is shown configured to fill the level switch chamber from the top vice the bottom of the chamber. In actual calibrations, the system is filled from the bottom fill connections.

This is a Severity Level V violation (Supplement I). (This is applicable to all units.)

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The HPCI inlet steam line drain pot can be filled from either the top or the bottom isolation valve. However, the most practical and reliable means of setting steam line drain pot level switch LS-73-5 is by filling the drain pot from the bottom isolation valve. Personnel failed to follow plant-approved instructions denoting that the drain pot be filled from the top isolation valve.

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

Electrical Maintenance Instruction 57 was revised June 2, 1983 to provide instructions for calibrating LS-73-5 by filling the drain pot from the bottom isolation valve.

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

Similar procedures for condensate drain pot level switches LS-71-5 and LS-73-8 (EMI 56 and 57, respectively) will be revised to provide instructions for calibrating the level switches by filling the drain pot float chamber from the bottom isolation valve. Documented discussion will be made with all electrical maintenance craft to point out that no deviations from instructions can be made without proper approved instruction revisions.

5. Date When Full Compliance Will Be Achieved

Documented discussions will be made by July 15, 1983. Procedures will be revised by August 15, 1983.

Appendix B (259, 260, 296/83-15-01)

Tennessee Valley Authority's letter dated November 27, 1981, in response to R. C. Lewis' letter dated October 20, 1981 which transmitted Inspection Report 50-259/260/296/81-28, stated that, in regard to Appendix A, Violation B, an inspection of residual heat removal service water air vacuum valves would be conducted every operating cycle.

Contrary to the above, a review of records and discussion with plant staff indicated no inspection was conducted during the unit 2 operating cycle completed on March 20, 1983.

1. Corrective Steps Which Have Been Taken

On April 18, 1983, a visual inspection of all 12 RHRSW valves was made to determine the type of valves and manufacturer, and to see if any visual damage was present. No visual damage was found. Five of the twelve valves were identified as being of the old style APCO valve. A meeting was held with members of the plant and the NRC resident inspector in which the findings of the previous day were discussed. The general agreement between the members of the meeting was to either buy five new valves of the improved type and change out all five old

style problem APCO valves or disassemble the valves and inspect the internals if purchase and changeout could not be accomplished within 30 days. Five new valves were purchased and installed and a follow-up to Report 81-28 was sent to NRC June 10, 1983 describing these actions.

2. Corrective Steps Which Will Be Taken To Avoid Further Deviations

Based on the description provided in revised response to Report 81-28, changing valve types in and of itself should preclude any further problems. Inspection in accordance with MMI-29 will be performed.

3. Date Corrective Actions Will Be Completed

Full compliance was achieved in May 1983 when the last old style valve was changed out.