

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

USNRC REGION II
ATLANTA, GEORGIA

400 Chestnut Street Tower II

83 JUL 19 AIO: 45

July 15, 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' June 16, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-19, -260/83-19, -296/83-19 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. 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

D S Kammer

D. S. Kammer
Nuclear Engineer

Enclosure

8308090738 830722
PDR ADOCK 05000259
Q PDR

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-19, 50-260/83-19, AND 50-296/83-19
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED JUNE 16, 1983

Appendix A

Item A - (260/83-19-02)

10 CFR 50, Appendix B, Criterion IX as implemented by TVA's QA Topical Report, TVA TR75-1, paragraph 17.2.9 and Operational Quality Assurance Manual (OQAM), Part II, Section 6.4, requires that measures shall be established to assure that special processes are controlled and accomplished using qualified procedures in accordance with applicable codes, standards, criteria, and other special requirements.

Contrary to the above, this was not met in that temporary alterations were affected to the unit 2 scram discharge volume east header drain tank instrument lines in the form of lead blankets without the issuance of a temporary alteration control form or unreviewed safety question determination.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 2.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Lead blanket shielding was installed in support of maintenance activities to reduce radiation exposure to employees working in the area. We have not been able to determine who installed the lead blanket or why a temporary alteration control form (TACF) or unreviewed safety question determination (USQD) was not obtained.

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

The lead shielding has been removed.

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

On July 7, 1983, the plant superintendent issued a memorandum to all section supervisors instructing them to view any temporary installation of radiation shielding as possibly requiring the issuance of a TACF or temporary structure permit in accordance with plant procedures.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Item B - (296/83-19-05)

Technical Specification 6.7.A requires that events listed shall be reported as expeditiously as possible, but within 24 hours to the appropriate Regional office.

Contrary to the above, the requirement was not met in that on May 20, 1983, reactor low pressure switches PS-3-74B, switch 2 and PS-68-96, switch 2, were found out of specification during the performance of Surveillance Instruction 4.2.B.7. The report to Region II was given on May 23, 1983.

This is a Severity Level IV Violation (Supplement I) 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

At Browns Ferry, initial screening of potential Licensee Event Reports (LERs) is performed by the shift technical advisor (STA). The form used provides instructions to notify the plant superintendent immediately if the LER is considered prompt. The STA involved in this event interpreted the Technical Specification involved and arrived at the erroneous conclusion that the event was not reportable, either as a prompt or 30-day report. By the time the potential LER could have a final review by the appropriate supervisor (the event having occurred on a Friday) the time limit of Technical Specification 6.7.A had expired. The telephone report was made to Region II by 1500 hours CDT on Monday, May 23, 1983.

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

The STA involved has been reinstructed regarding this error in interpretation and the consequences. Also, a memorandum was sent on June 3, 1983, to all STAs from the plant superintendent regarding this event emphasizing that any doubts or questions regarding possible prompt reports be referred to the appropriate section supervisor immediately.

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

No further corrective actions are required.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Item C - (259, 260, 296/83-19-01)

10 CFR 50, Appendix B, Criterion V, as implemented by TVA Topical Report 75-1, paragraph 17.2.5, requires 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 a review of valve lineup procedures on April 25, 1983, indicated no adequate procedure existed to align the condensate system to the residual heat removal system discharge piping as required by Technical Specification 3.5.H to assure maintenance of filled piping when the Pressure Suppression Chamber (PSC) system is inoperable. The PSC system has never been operable.

This is a Severity Level V Violation (Supplement I) 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 operating instructions had been updated to reflect a modification which was installed but not operational due to deficiencies.

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

The system status files were checked and updated to reflect actual status of valves. Condensate charging water was included in the file as the source of water.

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

The PSC charging system is being made operational on all three units. Operating instructions are being revised to reflect both modes of operation.

5. Date When Full Compliance Will Be Achieved

The PSC charging system will be made operational on all three units and the operating instructions revised to reflect both modes of operation by October 1, 1983.

Item D - (259, 260, 296/83-19-06)

Technical Specification 6.2.B.6 requires that copies of Plant Operating Review Committee (PORC) meeting minutes be sent to the Director of Nuclear Power.

Contrary to the above, as of May 19, 1983, copies of the PORC meeting minutes were not being sent to the Director of Nuclear Power.

This is a Severity Level V Violation (Supplement I) 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

As stated in the details of the report, the minutes were being incorrectly sent to J. A. (Jim) Green rather than H. J. (Jim) Green, Director of Nuclear Power. This was due to misunderstanding by clerical personnel of verbal directions given in March 1982 regarding distribution of PORC minutes.

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

The individual involved is no longer employed by TVA. Hence, no corrective action regarding this misunderstanding can be taken. However, PORC minutes are now being sent to H. J. Green, Director of Nuclear Power, by a standard cover memorandum addressed by title, rather than by name only.

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

No further corrective actions are required.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.