



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

R. D. (Rick) Machon  
Vice President, Browns Ferry Nuclear Plant

DEC 23 1994

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

10 CFR 2  
Appendix C

Gentlemen:

In the Matter Of	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
		50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - NRC INSPECTION REPORT  
50-259, 260, 296/94-26 - REPLY TO NOTICE OF VIOLATION (NOV)**

This letter provides our reply to the NOV transmitted by letter from R. V. Crlenjak, NRC, to O. D. Kingsley Jr., TVA dated November 29, 1994. This NOV concerns a lack of procedural adherence for a failure to determine the Emergency Diesel Generator reliability after a load run demand failure of an Emergency Diesel Generator. TVA admits to the violation as stated.

The Enclosure provides TVA's "Reply to the Notice of Violation" (10 CFR 2.201).

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If you have any questions regarding this reply, please contact me at (205) 729-3675.

Sincerely,

*E. Freedom for R.D. Machon*

R. D. Machon  
Site Vice President

Enclosure

cc (Enclosure):

Mr. Mark S. Lesser, Section Chief  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

NRC Resident Inspector  
Browns Ferry Nuclear Plant  
Route 12, Box 637  
Athens, Alabama 35611

Mr. J. F. Williams, Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

ENCLOSURE

TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT  
UNITS 1, 2, AND 3

REPLY TO NOTICE OF VIOLATION  
INSPECTION REPORT NUMBER  
50-259, 260, 296/94-26

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RESTATEMENT OF THE VIOLATION

"10 CFR PART 50 Appendix B, Criterion V instructions, Procedures and Drawings, as implemented by the TVA Nuclear Quality Assurance (NQA) Plan (TVA-NA-PLN89-A), Revision 3, requires that activities affecting quality shall be prescribed by documented procedures and activities shall be accomplished in accordance with these procedures. Licensee procedure 0-SI-4.9A, Emergency Diesel Generator (EDG) reliability and Start Log, revision 3, required that an EDG reliability determination be calculated following an EDG failure.

Contrary to the above, on October 31, 1994 - November 4, 1994, one example was identified in which a reliability determination was not performed per procedure 0-SI-4.9.A for an EDG 3D failure which occurred on September 7, 1993.

This is a Severity Level IV Violation (Supplement I)."

TVA's Reply to the Violation

1. Reason for the Violation

This violation resulted from a failure to follow procedure concerning the requirements of Surveillance Instruction (SI) 0-SI-4.9.A, "Diesel Generator Reliability And Start Log". Specifically, during a review of the EDG reliability logs, TVA identified an instance where the Emergency Diesel Generator (EDG) Reliability Program Worksheet was not completed following a load run demand failure of EDG 3D on September 7, 1993.

An oversight on the part of the individual responsible for maintaining the reliability log at the time of the event led to this violation. The individual, who is no longer employed by TVA, was contacted regarding the event. The individual indicated that he understood the requirements of the SI and that he thought the work sheet had been completed. However, no documentation can be located to show that the action has been completed.

2. Corrective Steps Taken And Results Achieved

To document this noncompliance with the SI, a Problem Evaluation Report was initiated in accordance with TVA's Corrective Action Program.

A review of the previous valid EDG failures was performed to determine if other EDG failures had been properly documented on the EDG Reliability Program Worksheet. This review did not identify any other examples where valid EDG failure was not properly documented. Therefore, TVA considers this event to be isolated.

The EDG Reliability Program Worksheet was completed for the September 7, 1993 load run demand failure. The worksheet results indicated that the EDG reliability is above the established target value of 0.95.

As previously stated, the individual involved in the event leading to this NOV is no longer employed by TVA. However, this event and the reasons for the violation have been discussed with the individual who is currently responsible for the EDG Reliability Program.

3. Corrective Steps That [have been or] Will be Taken to Prevent Recurrence

No further corrective actions are believed necessary.

4. Date When Full Compliance Will be Achieved

With respect to the matter identified above, TVA is presently in full compliance.