

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

January 26, 1984

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' December 16, 1983 letter to H. G. Parris requesting a supplemental response to our October 24, 1983 response to Item C of Inspection Report Nos. 50-259/83-33, -260/83-33, -296/83-33 for our Browns Ferry Nuclear Plant. In recent discussions between Jim Domer of my staff and F. Cantrell of your staff we indicated this supplemental response would be submitted a few days late. 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

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PDR ADOCK 05000239
Q PDR

SUPPLEMENTAL RESPONSE
NRC INSPECTION REPORT NOS.
50-259/83-33, 50-260/83-33, AND 50-296/83-33
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED SEPTEMBER 21, 1983

Item C (260/83-33-06)

Technical Specification 6.3.A.6 requires that detailed written procedures shall be prepared to cover surveillance and testing requirements.

Contrary to the above, this requirement was not met in that no procedure was written or used to address the method of APRM gain adjustments as performed by the shift nuclear engineer at 7:58 p.m. on July 16, 1983. The shift nuclear engineer was directed by the shift engineer to reset APRM gain factors in order to effectively reduce the R-factor as required by Technical Specification 2.1.A.1.6.

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

Response

Your letter dated December 16, 1983, states that the corrective action given for this item in our October 24, 1983, response does not meet the requirements of Technical Specification Sections 2.1.A.1.b and 2.1.A.1.d for units 2 and 3. Those sections prescribe, in part, the level of reactor thermal power at which an APRM flux scram and rod block are to occur. Our corrective action had involved the implementation of an approved procedure for increasing the APRM gain in order to reduce the trip setpoint by the "R" factor ratio.

TVA believes that this method of setpoint adjustment satisfies the intent of sections 2.1.A.1.b and 2.1.A.1.d for units 2 and 3; however, NRC has concluded that it does not satisfy the strict wording of those sections and is a satisfactory corrective action for unit 1 only. Therefore, TVA will delete the procedural methods referred to in item C of our response to the subject inspection report until a technical specification amendment request is approved making units 2 and 3 similar to unit 1 with regard to this item. This amendment request has previously been submitted and along with the approved procedure referred to above will constitute our revised corrective action.