

January 14, 1974

Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U.S. Atomic Energy Commission
Region II - Suite 818
230 Peachtree Street, NW.
Atlanta, Georgia 30303

Dear Mr. Moseley:

This is in response to Directorate of Regulatory Operations letter RO:II:NCM 50-259, 50-260 and 50-296, dated November 26, 1973, which transmitted Regulatory Operations Bulletin No. 73-6, "Inadvertent Criticality in a Boiling Water Reactor." Our responses to Bulletin 73-6 follow; each response is keyed to a particular section of the bulletin.

- 1.a.(1) - We have reviewed our control rod drive system operating and testing procedures and have determined adequate approved instructions exist.
- 1.a.(2) - These instructions were also reviewed to determine if they contain adequate prerequisites and procedural controls. We find that the approved startup test instructions which are the controlling documents for present plant operating conditions contain adequate prerequisites for testing associated interlocking and protective features. In certain instances, the plant operating instructions which will replace the instructions in use during the startup testing period were inadequate. These instructions are being revised as appropriate and will be available when required.
- 1.a.(3) - We have reviewed the instructions to determine that the prerequisites and details demonstrate compliance with technical specification requirements and design basis. A situation similar to that reported above in 1.a.(2) exists. The startup test instructions now in use are fully adequate, but the operational instructions which will replace them in some cases require improvement. This work will be completed by the time these instructions are needed.

8311080623 740114
PDR ADOCK 05000259
PDR
Q

*Requing
50-259/260/
296*

Mr. Norman C. Moseley, Director

January 14, 1974

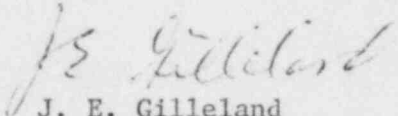
- 1.b. - The existing bypass installation procedures have been reviewed by engineering and operations personnel for technical adequacy and for administrative controls. Plant instructions were found to be adequate, but several procedural errors were uncovered as a result of this review. Corrective action was taken immediately upon discovery.
- 1.c. - Industrial Security Instruction No.1, Radiological Control Instruction No. 2, and the Radiological Emergency Plan contain procedures for access control and personnel accountability. These instructions have been reviewed to assure that they are current and accomplish their objectives.
- 1.d. - A review of the instruction governing shift turnover confirms that it requires communicating the status of all plant equipment within the jurisdiction of the individual being relieved.
- 2. - Standard Practice BEA36 delineates the management controls for temporary circuitry changes and temporary off-normal plant conditions. These temporary changes are made only in accordance with approved instructions which are periodically reviewed to ensure that safety-related equipment and procedural controls have not been degraded. Similar management controls are being used for permanent modifications and are fully understood by the plant supervisors. These supervisors have also reviewed the standard practice and understand the administrative controls established by it.
- 3. - An extensive and comprehensive training program has been established which includes training in safety-related activities. The program is repeated annually and is mandatory for all licensed operators. Safety-related activities that are infrequent, complex, or have unusual safety significance will be covered by

Mr. Norman C. Moseley, Director

January 14, 1974

the review of applicable BWR abnormal occurrences and operating experience reports and by plant abnormal and emergency operating instructions.

Very truly yours,



J. E. Gilleland

Assistant to the Manager of Power

20

Letter from Tennessee Valley Authority, J. E. Gilleland, JAN 17 1974
dated January 14, 1974 - 50-259, 50-260 and 50-296

DISTRIBUTION:

H. D. Thornburg

→ O:HQ (4)

DR Central Files

Directorate of Licensing (4)

PDR

Local PDR

NSIC

OIS, OR

RECEIVED
RECEIVED
1974 JAN 21 AM 9 41
U.S. ATOMIC ENERGY COM.
DIVISION OF COMPLIANCE