

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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February 22, 1984

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

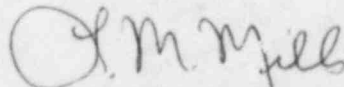
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' January 23, 1984, letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-57, -260/83-57, -296/83-57 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



L. M. Mills, Manager
Nuclear Licensing

Enclosure

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ENCLOSURE
RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-57, 50-260/83-57, AND 50-296/83-57
RICHARD C. LEWIS'S LETTER TO H. G. PARRIS
DATED JANUARY 23, 1984

Appendix A

Item 1 (259/83-57-02)

Technical Specification 6.3.D.2 requires each high radiation area in which the intensity of the radiation is greater than 1,000 mrem/hr. shall be provided with locked doors to prevent unauthorized entry.

Contrary to the above, the requirement was not met in that on December 19, 1983, the 1-B reactor water cleanup pump room was not locked and was not positively controlled to prevent unauthorized entry. This room is posted as a high radiation area. A radiological survey was conducted on December 20, 1983, and the general area reading was 1,200 mrem/hr.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The cause for the violation was personnel error. A health physics (HP) technician required entry into both the 1-A and 1-B reactor water cleanup (RWCU) pump rooms in order to perform an HP survey. At the time of the incident, the 1-A RWCU pump room was not a high radiation area while RWCU pump room 1-B was a high radiation area. The technician had both doors unlocked at the same time for entry and entered RWCU pump room 1-A first.

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

The incident was discussed with the HP technician involved and appropriate administrative action has been taken to emphasize the need to follow procedures. A policy statement was issued to all HP technicians reaffirming that high radiation area doors cannot be left unattended.

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

Each HP technician will be required to document that he or she understands the requirements for the control of entry into high radiation areas.

5. Date When Full Compliance Will be Achieved

Full compliance will be achieved by February 28, 1984, when all HP technicians will have documented that they understand the control requirements for high radiation areas.

Item 2 (259/83-57-01)

Technical Specification 6.3.A.7 requires that detailed written procedures related to health physics and radiation control practices be followed. Radiation Control Instruction 9 requires that Special Work Permit (SWP) instructions be followed.

Contrary to the above, the requirement was not met in that on December 13, 1983, two operators were observed in the Unit 1 N.W. quadrant, 519 level, to not be in compliance with the requirements of SWP 1-1-18285 which forbade entry into the highly contaminated N.W. quadrant without a special SWP. A special SWP was not available for entry.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 1.

1. Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Personnel involved overlooked Special Instruction 4 of SWP 1-1-18285, which forbade entry to elevation 519 of the northwest quadrant of the unit 1 reactor building. SWP 1-1-18285 was written to define the radiological controls required for entry to the reactor building elevation 519 and contained five special instructions. A survey of the area where the individuals entered found maximum contamination levels to be 12,000 dpm per 100 square centimeter. The individuals involved were conservatively dressed when they entered the area, wearing a full set of protective clothing and respirators.

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

The incident was discussed with the individuals involved, and appropriate administrative action was taken to emphasize the importance of

strict adherence to SWP special instructions and requirements. The incident was also discussed with plant supervisors in the December 14, 1983, morning management meeting.

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

No further corrective action is required.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 29, 1983, when the incident was discussed with the individuals involved and appropriate administrative action taken.

Item 3 (259, 260, 296/83-57-03)

Technical Specification 6.3.A.10 requires that detailed written procedures be prepared, approved, and adhered to as related to fire protection procedures. Mechanical Maintenance Instruction (MMI) 122 implements a high pressure fire protection system flush and strainer inspection program to assure system operability.

Contrary to the above, the requirement was not met in that procedural steps for the fixed spray system flush were not followed during observation by the inspector on December 17, 1983, in that no procedure was available at the work site to assure procedural compliance. Additionally, MMI-122, Part 1 (fixed spray flush and strainer inspection), was inadequate and could not be performed as written. The procedure listed isolation valves not actually installed in the system. The procedure also required actuation of the deluge valve that, if actuated, would spray plant equipment. MMI-122 has been conducted monthly since April 1981, with no apparent problems noted by plant personnel. The Part 1 data sheet for MMI-122, additionally, does not indicate completion of the quarterly cleaning of system strainers as required by MMI-122.

This is a Severity Level IV Violation (Supplement I) 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 violation occurred due to a combination of procedural inadequacy and personnel error. Craftsmen performing the work were not following the requirements of MMI-122, and MMI-122 itself contained procedural errors.

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

No immediate corrective action was taken because it was determined that the work had been performed correctly even though the procedure was in error. Strainer cleaning had been documented quarterly on the maintenance request issued for performing MMI-122. The MMI-122 instruction has since been totally rewritten and checked on a trial basis by walking through the instruction to ensure all steps reflect those actions necessary to maintain the fire protection system. Also, craftsmen and foremen have been instructed on the latest revision of MMI-122 at the work site and reminded of their responsibilities to adhere to those requirements.

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

No further corrective action is required.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on February 1, 1984, when MMI-122 revisions were completed.