

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

February 17, 1984

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

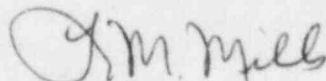
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' January 17, 1984, letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-56, -260/83-56, -296/83-56 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. Mike Hellums of my staff and W. H. Bradford of your staff discussed on February 16 a one-day extension to February 17, 1984. 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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RESPONSE - NRC INSPECTION REPORT NOS.  
50-259/83-56, 50-260/83-56, AND 50-296/83-56  
R. C. LEWIS'S LETTER TO H. G. PARRIS  
DATED JANUARY 17, 1984

(259/83-56-01)

Technical Specification 4.6.H.6 requires that for each snubber that fails to meet the acceptance criteria an additional sample of 10% of that group is to be tested.

Contrary to the above, when functional testing of snubbers was conducted during the Cycle 5 outage and 2 snubbers in group 3 failed to meet the acceptance criteria the additional sample of 9 snubbers (10%) for each failed snubber was not functionally tested.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violations if Admitted

The surveillance instructions (SIs) describe the various types of snubbers and indicate that the snubbers are in a group. However, the SIs then identify the snubbers by category and contain a listing of the snubbers in each category. The SIs further state that the "snubbers are grouped into categories." The listing of the various categories of snubbers is divided into systems. The words "group" and "category" are used in a confusing manner which resulted in the engineer basing the 10-percent retest sample on the system snubbers within a category.

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

The 10-percent retest sample calculation was made for all snubbers within category/group 3. The additional 15 snubbers that were selected were successfully tested before the startup of unit 1.

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

The SIs for snubbers will be revised to clarify the usage of the word "category."

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 1, 1984, when the SIs will have been revised.