



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

MAR 06 1992

O. J. "Ike" Zeringue  
Vice President, Browns Ferry Operations

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

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,  
296/91-43 - REPLY TO NOTICE OF VIOLATION (NOV)

This letter provides TVA's reply to the NOV transmitted by letter from  
B. A. Wilson to D. A. Nauman dated February 6, 1992. TVA acknowledges  
the violation.

Enclosure 1 to this letter provides TVA's "Reply to Notice of Violation"  
in accordance with 10 CFR 2.201 and 10 CFR 2 Appendix C. Enclosure 2  
provides a listing of commitments made in this reply.

If you have any questions regarding this response, please contact  
Raul R. Baron at (205) 729-7570.

Sincerely,

O. J. Zeringue

Enclosures  
cc: See page 2

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U.S. Nuclear Regulatory Commission

MAR 06 1992

Enclosures

cc (Enclosures):

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

Mr. Thierry M. Ross, Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
11555 Rockville Pike  
Rockville, Maryland 20852

Mr. B. A. Wilson, Project Chief  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Enclosure 1

Tennessee Valley Authority

Browns Ferry Nuclear Plant

Reply to Notice of Violation

Inspection Report Number

50-259, 260, 296/91-43

VIOLATION

"During the Nuclear Regulatory Commission (NRC) inspection conducted on December 16 - January 16, 1991, a violation of NRC requirements was identified. This violation involved the failure to follow the Unit Separation procedure for personnel access. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

10 CFR, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

Site Procedure, SSP-12.50, Unit Separation for Recovery Activities, Section 3.4, implements the requirement for control of personnel access into Unit 2 operating spaces, and directs Unit 3 personnel to wear color coded hardhats and unique plant access picture badges.

Contrary to the above, this requirement was not met on January 8, 1992, when a NRC inspector identified Unit 3 personnel without uniquely identified access badges. Licensee action to resolve this issue in December, 1991, did not correct this problem.

This is a Severity Level IV Violation (Supplement I) applicable to all three units."

1. Reason for the Violation

The reason for the violation was insufficient communication to personnel of the procedural controls of SSP 12.50. SSP 12.50 specifies that non-exempt Unit 3 recovery personnel shall be identified by light blue hard hats and unique plant access (picture) badges.

On January 8, 1992, two Unit 3 Stone And Webster Engineering Corporation (SWEC) contractor personnel did not comply with SSP 12.50 in that their badges were not uniquely identified. The two individuals did not understand the significance of the unique plant access badges. Contributing to this noncompliance was the failure to provide a timely notification to the Plant Access Section (PAS) of their transfer. The two individuals had just transferred from an organization not requiring unique plant access badges to a Unit 3 organization requiring unique plant access badges.

TVA has utilized BFN PAS to help implement the administrative requirements of SSP 12.50 by having PAS place a unique identifier on non-exempt Unit 3 contractor/employee badges. The determination of whether the unique identifier is required is based on an individual's assigned organization. Therefore, if an individual is transferred from a Unit 2 organization to a Unit 3 organization, the PAS must be notified in order to place the unique identifier on the individual's badge.

2. Corrective Steps Taken and Results Achieved

SWEC immediately provided their employees orientation on proper badge and hard hat identification and increased the emphasis placed on this requirement during its new hire orientation. SWEC also modified its "Individual Release to Protected Area" form to clarify badge requirements. As a interim precautionary measure, SWEC is monitoring personnel badges at the craft change house and access portal. Additionally, Restart Management personnel (TVA and Contractor) were directed to emphasize the unique identification requirement for entering the protected area and stress the need to maintain the visibility of this program to their employees. As an enhancement, on January 31, 1992, BFN began requiring organizations transferring individuals to complete and provide an onsite transfer form to PAS prior to the effective date of the transfer.

3. Corrective Steps That [have been or] Will Be Taken to Avoid Further Violations

As noted in the violation, discrepancies between color coded hard hats and unique plant access picture badges first became evident in December, 1991. At that time, TVA issued a written communication to emphasize SSP 12.50 requirements for unique identification. Accordingly, since this

did not preclude the January 8, 1992 occurrence, TVA considers it prudent to supplement the written communications in this area with administrative controls. To this end, the requirements for the use of the transfer form, described above, will be incorporated into an appropriate procedure by March 31, 1992.

4. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by March 31, 1992, when the transfer form and the requirements for its use are incorporated into an appropriate procedure.

ENCLOSURE 2

Tennessee Valley Authority

Browns Ferry Nuclear Plant (BFN)

Reply to Notice of Violation (NOV)

Inspection Report Number

50-259, 260, 296/91-43

LIST OF COMMITMENTS

The appropriate procedure will be revised by March 31, 1992 to require organizations transferring individuals to complete and provide an onsite transfer form to PAS prior to the effective date of the transfer.