

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

DEC 10 4 8:36

December 4, 1984

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

Please refer to J. W. Hufham's letter to you dated November 16, 1984 which contained our response to Inspection Report 84-26 for our Browns Ferry Nuclear Plant. As discussed between D. Verrelli of your staff and me on November 30, 1984, we have revised our response for item 2 of the subject inspection report. Enclosed is the pertinent sections of that response that have been revised. If you have any questions, please call Dennis McCloud 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

James A. Domer

James A. Domer
Nuclear Engineer

Enclosure

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Q PDR

ENCLOSURE
REVISED RESPONSE FOR
OIE INSPECTION REPORT NOS.
50-259/84-26, -260/84-26, -296/84-26
BROWNS FERRY NUCLEAR PLANT

Item 2 (259, 260/84-26-04)

Technical Specification 4.5.C.4 requires that when it is determined that one of the RHRSW pumps supplying standby cooling is inoperable at a time when operability is required, the operable RHRSW pump on the same header and its associated diesel generator and the Residual Heat Removal (RHR) heat exchanger header and associated essential control valves shall be demonstrated to be operable immediately. Plant Surveillance Instruction 4.5.C., RHRSW System and Emergency Equipment Cooling Water System Valve Operability Test (Common), states to perform Section 4.5.C.1 (Valve 23-57 only) to demonstrate operability.

Contrary to the above, this requirement was not met in that when the B1, B2, and D1 RHRSW pumps were declared inoperable on July 20, 1984, the associated essential control valves (valve 23-57) were not demonstrated to be operable immediately and were never tested while the pumps were inoperable. Unit 1 was operating at 100% power and unit 2 at 55% power.

This is a Severity Level IV violation (Supplement I) applicable to units 1 and 2.

1. Admission or Denial of the Alleged Violation

TVA admits to the violation as stated.

2. Reasons For the Violations

Due to a personnel error and a poorly written procedure, valve FCV 23-57 for units 1 and 2 was not tested when RHRSW pumps supplying standby cooling were determined to be inoperable.

3. Corrective Steps Which Have Been Taken and Results Achieved

Live time training was conducted for operators concerning RHRSW operability requirements.

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

The training will avoid future violations. A general revision to SI 4.5.C is being made to improve the overall clarity of the instruction.

5. Date When Full Compliance Will be Achieved

Full compliance will be achieved by March 1, 1985, when a general revision to SI 4.5.C is approved and issued for use.