

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

May 24, 1985

U.S. Nuclear Regulatory Commission  
Region II  
ATTN: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3 - NRC-OIE REGION II INSPECTION  
REPORT 50-259/85-15, 50-260/85-15, 50-296/85-15 - RESPONSE TO VIOLATION

Enclosed is our response to R. D. Walker's April 24, 1985 letter to  
H. G. Parris transmitting IE Inspection Report Nos. 50-259/85-15,  
50-260/85-15, and 50-296/85-15 for our Browns Ferry Nuclear Plant which cited  
TVA with two Severity Level IV Violations.

If you have any questions, please get in touch with R. E. Alsup 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

*J. A. Domer*  
J. A. Domer, Chief  
Nuclear Licensing Branch

Enclosure

cc: Mr. James Taylor, Director (Enclosure)  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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ENCLOSURE  
RESPONSE  
NRC INSPECTION REPORT NOS.  
50-259/85-15, 50-260/85-15, AND 50-295/85-15  
ROGER D. WALKER'S LETTER TO H. G. PARRIS  
DATED APRIL 24, 1985

Enclosure 1

Item 1

Technical Specification 3.7.B.1 requires that all three trains of the Standby Gas Treatment (SBGT) System be operable at all times when secondary containment integrity is required except one train may be out of service for seven days as specified in 3.7.B.3.

Contrary to the above, this requirement was not met in that during a routine tour of the normally locked SBGT room on March 8, 1985, the 480-volt circuit breaker (2A) for the humidity control heater of SBGT "C" train was found in the tripped condition making the "C" train inoperable. Indication of this condition existed at the back panel of Unit 2 control room where both the "OFF" (green) and "ON" (red) indicating lights for the humidity control heaters were not illuminated and a maintenance request sticker was still in place next to the indicating lights for a previously cleared maintenance request, M.R. A-312188, for troubleshooting a previous problem with the heater breaker on October 6, 1984 (October 16, 1984). The circuit breaker was replaced and the train returned to service on March 9, 1985.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation.

2. Reasons For the Violation

There were inadequate procedures in that they did not specify frequency and method for checking back panels. The orange maintenance sticker was not properly removed when the maintenance request was completed on October 16, 1984. Also, operators failed to recognize that the relative humidity heater feeder breaker was in a tripped condition prior to it being identified by the resident inspector.

3. Corrective Steps Which Have Been Taken and Results Achieved

'C' SBGT train was declared inoperable, the heater breaker was changed out and operability was demonstrated per SI requirements. A monitoring program was established to determine if other problems exist that could be causing a breaker trip.

Item 1 (continued)

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

1. Procedures covering panel inspections will be revised to specify frequency and method.
2. Active component monitoring requirements and normal indications are being covered in supplemental training and operator hot license training.
3. Improve the controls on clearing maintenance identification tags.
4. The relative humidity control breaker is still being monitored and evaluated for possible deficiencies.

5. Date When Full Compliance Will Be Achieved

All training, procedure revisions, and component evaluations will be completed by June 30, 1985.

Item 2, Part 1

Technical Specification 6.3.A.6 requires that detailed written procedures covering surveillance and testing requirements be prepared and adhered to.

Contrary to the above, Surveillance Instruction 2 (SI-2), "Instrument Checks and Observations," was not adhered to on March 5, 1985 in that the comparison of reactor water level instrument readings required by Section 2.1 was not performed on the Units 1 or 2 level instruments. Section 2.1 of SI-2 implements the daily reactor water level instrument checks required by Technical Specifications 4.2.A, 4.2.B, and 4.2.F. An instrument check is defined in Technical Specification 1.V.4 as a qualitative determination of operability by observation of instrument behavior during operation. This determination shall include, where possible, comparison of the instrument with other independent instruments measuring the same variable.

Contrary to the above, SI-2, "Instrument Checks and Observations," was inadequately written such that it did not fully implement the Technical Specification surveillance requirements. Technical Specifications 4.2.A, 4.2.B, and 4.2.F require daily reactor water level instrument checks consisting of a comparison with other independent instruments where possible. Section 2.1 of SI-2 implements this requirement; however, it erroneously requires comparison of instruments which are not independent in that they share common sensing lines even though independent level instruments were available for comparison. SI-2 was additionally inadequate in that it did not include appropriate quantitative or qualitative acceptance criteria for determining what constitutes a satisfactory comparison of independent reactor water level instruments.

1. Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

2. Reasons For the Violation

Technical specifications require that specific reactor water level instrumentation be available and checked once per daily shift. An instrument check involves making a qualitative determination of acceptable operability by observation of instrument behavior during operation. The requirement further states that where possible the instrument will be compared with other independent instruments measuring the same variable. There is no requirement to specify qualitative criteria in the surveillance instruction. Surveillance Instruction 2 was written to fulfill frequent instrument checks on plant instrumentation including reactor water level. Qualitative verification of reactor water level instruments relied upon operator observation and comparison among similar water level instruments. Considerations for instrument independence in the instruction were not carried to adequate depth.

Item 2, Part 1 (continued)

3. Corrective Steps Which Have Been Taken and Results Achieved

An SI 2 revision has been initiated to ensure that compared reactor water level instruments are totally independent (having separate reference legs). Written guidance has been provided in the instruction stating minimum standards for acceptable instrument comparisons. This eliminates the need for operators to memorize instrument relationships and independently choose acceptance criteria for comparisons.

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

When the action in step 3 is complete, recurrence control will be effected.

5. Date When Full Compliance Will Be Achieved

SI 2 will be revised and in use by the unit 3 startup.

Item 2, Part 2

Contrary to the above, the licensee failed to adhere to Surveillance Instruction 4.2.B-4, "Instrumentation that Initiate or Control the Core Standby Cooling Systems (CSCS) - Drywell High Pressure (PS-64-58-E-H)," on March 14, 1985 in that:

- a. The pneumatic calibrator was not connected to the test tee as specified in Step 4.3 but was instead connected to a fitting which was disconnected in the instrument drain tubing.
- b. Pressure was not decreased below 1.2 psi as required in Step 4.5 but was instead decreased until the applicable relay dropped out at about 1.7 psi.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons For the Violation

Personnel error

3. Corrective Steps Which Have Been Taken and Results Achieved

The individual that errored was given time off including loss of pay.

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

There is no further corrective planned.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.