

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

April 22, 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 50-259/85-09, -260/85-09, -296/85-09 - RESPONSE TO VIOLATION

Enclosed is our response to D. M. Verrelli's March 22, 1985 letter to
H. G. Parris transmitting IE Inspection Report Nos. 50-259/85-09,
50-260/85-09, and 50-296/85-09 for our Browns Ferry Nuclear Plant which cited
TVA with one Severity Level V Violation.

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
Nuclear Engineer

Enclosure

cc (Enclosure):

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

Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
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RESPONSE
NRC INSPECTION REPORT NOS.
50-259/85-09, 50-260/85-09, AND 50-296/85-09
D. M. VERRELLI'S LETTER TO H. G. PARRIS
DATED MARCH 22, 1985

Enclosure 1

Item 1.A

Technical Specification 6.3.A requires that detailed written procedures, including applicable check-off lists, shall be prepared, approved and adhered to for operations and surveillance requirements.

Contrary to the above, this requirement was not met in that the Surveillance Instruction 4.2.F.18 ("Main Steam Relief Valve Thermocouple and Acoustic Flow Monitor") did not include appropriate acceptance criteria to ascertain whether the recorded values met the "consistency and nominally expected value" criteria.

1. Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

2. Reasons For the Violation

Surveillance Instruction (SI) 4.2.F.18 was deficient in that there were no nominally listed values for relief valve tailpipe temperature and output signals for the subject instruments.

3. Corrective Steps Which Have Been Taken and Results Achieved

A general revision to SI 4.2.F.18 was made on March 5, 1985. Included in this revision was a nominal range for relief valve tailpipe temperatures and for expected output from the acoustic monitor.

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

No further action is required.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Item 1.B

Technical Specification 6.3.A requires that detailed written procedures, including applicable check-off lists, shall be prepared, approved and adhered to for operations and surveillance requirements.

Contrary to the above, the requirement was not met in that the required position of dampers 0-30-503, 504, 505 and 506 in the valve checklist contained in Operating Instruction 30 "Ventilation System" was ambiguously stated ("OPEN TO PRESET POSITION") such that operators were unable to determine the correct required position. This was a contributing cause to a damper misalignment event on January 14, 1985 which resulted in airborne radioactivity in the radwaste building in excess of 10 CFR 20 maximum permissible concentration. (Xe 135).

1. Admission or Denial of the Alleged Violation

TVA admits to the violation as stated.

2. Reasons For the Violation

Normal operation of the radwaste ventilation exhaust system requires that the dampers for the filter train in service be open and the dampers for the out-of-service train be closed. Thus, the dampers for each train could be open or closed dependent on the filter train that is in service. Operations Instruction (OI) 30 was deficient in that it specified that all four dampers be open to preset position rather than requiring that dampers be open for the filter train that is in service and closed for the out-of-service filter train. We believe damper misalignment was caused by either vibration causing the damper to close or personnel error.

3. Corrective Steps Which Have Been Taken and Results Achieved

OI 30 was revised on March 8, 1985, with a note specifying that one exhaust filter train be in service at a time, and the damper position required when each train is in service. The damper position checklist has been revised to require that the damper position be recorded. This revision to OI 30 also requires second party verification for damper position. Besides these procedural changes, the dampers for the filter train in service have double nuts installed as a locking device, and the room where these dampers are located is locked.

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

No further action is required.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

The above two items constitute one Severity Level V violation applicable to all units.