

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
1630 Chestnut Street Tower II

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March 15, 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:

Enclosed is our response to R. D. Walker's February 13, 1985 letter to H. G. Parris transmitting IE Inspection Report Nos. 50-259/84-52, -260/84-52, -296/84-52 for our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. If you have any questions, please call R. E. Alsop 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  
Atlanta, Georgia 30339

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RESPONSE  
NRC INSPECTION REPORT NOS.  
50-259/84-52, 50-260/84-52, AND 50-296/84-52  
ROGER D. WALKER'S LETTER TO H. G. PARRIS DATED  
FEBRUARY 13, 1985

Enclosure 1

Item 1 - (50-259/260/296/84-52-01)

The following violations were identified during an inspection conducted on December 3-6, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

10 CFR 50, Appendix B, Criterion XVI, as implemented by the licensee's approved quality assurance program, requires that measures established to correct conditions adverse to quality shall assure that the cause of the condition is identified and corrective action is taken to preclude repetition.

Contrary to the above, following the identification of a problem with pinion gear orientations in 1981, the licensee failed to adequately establish procedures and controls to ensure that the Limitorque Valve Operator pinion gear for safety related valve 3-FCV-73-3 was properly installed following electrical maintenance on August 2, 1982.

This is a Severity Level IV violation (Supplement I).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons For the Violation

The motor pinion gear on this valve was verified as installed correctly in 1981 during inspections prompted by IE Circular 79-04. Review of maintenance records since that time indicates that the gear was most likely reversed following electrical maintenance work on the valve motor. The governing electrical maintenance instruction (EMI-18) covers changeout of the motor but does not detail pinion gear replacement. Plant procedures were deficient in that the electrical and mechanical maintenance instructions were not adequately linked together.

3. Corrective Steps Which Have Been Taken and Results Achieved

The motor pinion gear was replaced with a new gear in the proper orientation. A 20 percent sample (36 valves total) of emergency core cooling system valves was inspected, and no pinion gears were found reversed.

EMI-18 has been revised to reference the pertinent mechanical maintenance instruction (MMI-87) for pinion gear replacement. Revisions to MMI-87 have been approved to include second party verification on pinion gear orientation. Also, training classes for machinists and engineers have been conducted to discuss this situation.

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

No further action is necessary.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.