TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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December 17, 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:

Enclosed is our supplemental response to your letter dated November 16, 1984 regarding OIE Inspection Report 84-01 (Enforcement Action 84-25) for our Browns Ferry Nuclear Plant. This response provides the results of a reevaluation by TVA of violation I.D.(2). The enclosed response was discussed in a conference call between Dave Verrelli of your staff and members of the TVA staff on December 17, 1984. 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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SUPPLEMENTAL RESPONSE

VIOLATION I.D.(2)

OIE INSPECTION REPORT 84-01 (EA 84-25)

Engineering Procedure 1.48 was developed by TVA to provide procedural guidance on the compilation, evaluation, and administrative handling of plant data relevant to nonconformances (i.e., NCRs, audit deficiencies, etc.) that apply to operating nuclear plants. This plant data is assembled solely to provide engineering information to be used for operating decisions, such as application of technical specification limiting conditions for operation (LCO) and for possible reporting of the condition in question to NRC. The FE/ER developed in accordance with EP 1.48 does not determine operability per the plant technical specifications. Instead, the FE/ER supplements the documented noncompliance by providing more detailed information concerning the component-level failure mechanisms/modes; failure consequences; and conclusions/suggested corrective actions.

When these evaluations indicate the component is unable to meet design requirements, the FE/ER is assigned a category III determination and immediately transmitted to the site for remedial action. However, when the evaluation of the deficient condition indicates that functional impairment of the component is unlikely and yet does not yield a conclusive answer that the component can perform its required design function, the condition is essentially declared "indeterminate" and the FE/ER is assigned a category II status. Revision 1 of EP 1.48 (issued April 26, 1984) now requires that the FE/ER be completed within 15 calendar days after receipt of the documented noncompliance by the organization responsible for FE/ER preparation. FE/ER's

initially assigned a category II status are submitted to the appropriate site personnel for determination of any corrective actions and reportability. Evaluation efforts continue to more clearly define the ability of the component in question to perform its required design function. The additional information is documented by a revision to the original FE/ER within 20 calendar days. We believe this timeframe ensures an orderly and thorough evaluation in an expedited manner.

All category II and III NCRs are evaluated at the site for reportability and remedial action. While the information provided in the FE/ER may be helpful in making the reportability determination, the technical specification requirements (including operability considerations) and 10 CFR 50.72/73 clauses are the source documents. In the response to item II.A.2 of the August 20, 1984 submital to this inspection report, TVA admitted that a mistake was made in the reportability evaluation on this particular item. Category II and III NCRs are, however, the routine subject of LERs.

Corrective actions to resolve nonconforming conditions are accomplished through the design change request (DCR)/engineering change notice (ECN) process. Needed design changes to correct these conditions are implemented based on safety significance, existing work priorities, and schedules. This approach is consistent with our overall strategy for scheduling modifications as presented in our Integrated Schedule submittals.