TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

October 29, 1979

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

POOR ORIGINAL

Dear Mr. O'Reilly:

Enclosed is our response to C. E. Murphy's October 4, 1979, letter, RII:VLB 50-259/79-25, 50-260/79-2[illegible], 50-296/79-25, 50-327/79-45, 50-328/85, 50-390/79-35, 50-391/79-30, 50-438/79-22, 50-439/79-22, 50-518/79-21, 50-519/79-21, 50-520/79-21, 50-521/79-21, 50-553/79-14, 50-554/79-13, 50-566/79-14, and 50-567/79-14, concerning V. L. Brownlee's report of his inspection of TVA corporate offices in Knoxville and Chattanooga, Tennessee, during the periods of August 30-31 and September 6-7, 1979. As a result of his inspection, certain activities appeared to be in noncompliance with NRC requirements. Enclosed is our response to Mr. Brownlee's report which we have reviewed and found no proprietary information.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure
cc: Mr. Victor Stello, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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In addition, Browns Ferry Nuclear Plant management has been instructed to review all LER's occurring after August 10, 1977, for potential reportability under part 21. Any item found to be reportable under part 21 will be handled according to the revised procedures described above. This review will be completed and any part 21 items identified will be reported by November 1, 1979.

Date Full Compliance Will Be Achieved

Full compliance will be achieved by November 1, 1979.

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ENCLOSURE

RESPONSE TO C. E. MURPHY'S LETTER DATED
OCTOBER 4, 1979, REFERENCE: RII:VLB
50-259/79-25, -260/79-25, -296/79-25,
-327/79-45, -328/79-25, -390/79-35, -391/79-30, -438/79-22, -439/79-22,
-518/79-21, -519/79-21, -520/79-21, -521/79-21, -553/79-14, -554/79-13,
-566/79-14, -567/79-14

Infraction

As required by Section 21.21(a) of 10 CFR 21 each entity subject to these regulations shall adopt appropriate procedures for evaluation of deviations and assure that a director or responsible officer is informed if the construction or operation of a facility, or activity, or a basic component supplied for such a facility or activity fails to comply with the Atomic Energy Act of 1954, as amended, or any applicable rule, regulation, order or license of the Commission relating to a substantial safety hazard or contains a defect. Section 21.21(b)(3) delineates the information to be included in the written report. Section 21.51 delineates the maintenance of records requirements. Division of Power Production Procedure N77A14, December 9, 1977, was established to implement the requirements of 10 CFR Part 21.

Contrary to the above, TVA has not implemented the established Division of Power Production Procedure N77A14 and Browns Ferry implementing procedures to assure that deviations are evaluated as required by 21.21(a)(1); the responsible officer is informed as required by 21.21(a)(2); the written report to the Commission contains the information as required by 21.21(b)(3); and the required records are maintained as required by 21.51.

Response

Corrective Action Taken

TVA's Division of Nuclear Power procedures governing the documentation, evaluation, handling, and reporting of reportable items have been revised to include the following:

a. Problems which are reportable as LER's will also be evaluated for reportability under part 21.

b. When an LER is used to report a part 21 item, it will be reviewed to ensure that all information required by part 21 is included.

c. When an LER is used to report a part 21 item, an information copy of the LER will be sent to the "responsible officer."

These revised procedures were approved September 28, 1979.

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