

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

U.S. NRC REGION II
400 Chestnut Street Tower II
ATLANTA, GEORGIA 30303

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December 5, 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

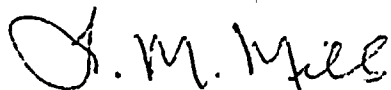
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' November 8, 1979, letter, RII:RFS 50-259/79-27, 50-260/79-27, and 50-296/79-27, concerning activities at Browns Ferry Nuclear Plant which appeared to be in noncompliance with NRC requirements.

We have reviewed the above inspection report and find no proprietary information in it.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

RESPONSE TO R. C. LEWIS' LETTER DATED
NOVEMBER 8, 1979, REFERENCE: RII:RFS
50-259/79-27, 50-260/79-27, 50-296/79-27

Appendix A of the referenced letter identified two items which were apparently in noncompliance with NRC requirements. The following are those items and our response.

Infraction

- A. As required by Technical Specification 6.3.A, detailed written procedures shall be prepared, approved, and adhered to. Mechanical Maintenance Instruction 1 states that the steam separator will be transported from the vessel to its storage pit under water. Radiation Control Instruction 1 states that the Health Physics supervisor's approval is required for dose rates to workers which exceed 1 Rem per hour.

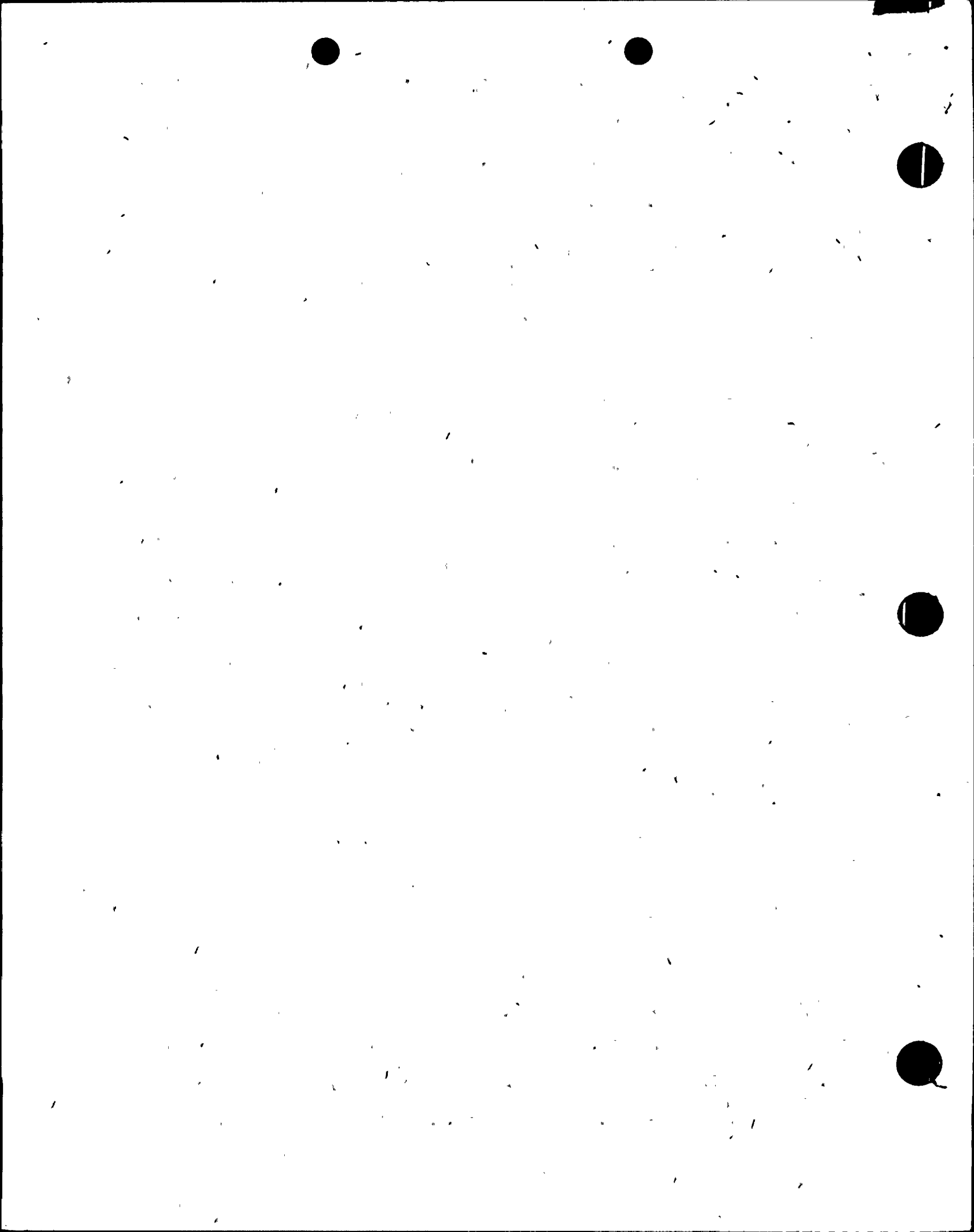
Contrary to the above, on August 28, 1979, the steam separator was transported from the reactor cavity to its storage pit with the top four to six feet uncovered. Dose rates to workers were 1.5 Rem per hour during part of the movement and the Health Physics supervisor's approval was not obtained.

This is an infraction applicable to unit 3.

Response

Corrective Steps Which Have Been Taken and Results Achieved

Mechanical Maintenance Instruction 1 has been revised to clarify the procedure for transferring the moisture separator from the reactor vessel to the equipment pit. The revised procedure allows for the transfer of the separator to the equipment pit partially submerged if sufficient water is not available within a reasonable time to fill the reactor well. However, revisions have also been made to provide proper warnings that a radiation hazard may exist and that precautions are necessary to minimize exposure to personnel.



Corrective Steps Taken to Avoid Further Noncompliance

A precaution will be added to the maintenance instruction to check the path clear for the transfer of the moisture separator to the equipment storage pit.

Date Full Compliance Achieved

Full compliance was achieved on September 25, 1979.

Supplemental Information

During the moisture separator transfer on August 28, 1979, the personnel had to enter a 1.5 Rem per hour field when the moisture separator became entangled with an air hose leading to the main steam line plug. This air line had to be untangled from the moisture separator before the separator could be safely moved to reduce exposure rates. Had this problem not developed, the dose rate to workers would have been below 1 Rem per hour.

Infraction

- B. As required by 10 CFR 73.55(e)(6), individuals not authorized by the licensee to enter protected areas without escort must be escorted in the protected areas by a watchman or other individual designated by licensee. As implemented by Paragraph 1.7 of the licensee's approved Security Plan, the Plant Superintendent will assign trained plant personnel to perform necessary escort duties.

Contrary to the above, on September 5, 1979, two individuals were observed in the Outage office, within the protected area, without an escort assigned or present.

This is an infraction.

Response

Corrective Steps Taken and Results Achieved

An escort had been assigned to these two TVA employees but had left the area. When the deficiency was identified, the person assigned as the escort was reeducated concerning his responsibilities as an escort.



Corrective Steps Taken To Avoid Further Noncompliance

Reeducation of, this individual should ensure no further noncompliances in this area.

Date Full Compliance Achieved

Full compliance was achieved on September 5, 1979.

