

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority  
Browns Ferry 1, 2, and 3

Docket Nos. 50-259, 50-260 & 50-296  
License Nos. DPR-33, DPR-52 & DPR-68

As a result of the inspection conducted on December 1-31, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. 10 CFR 50.59(a)(1) permits a licensee to make changes in the facility as described in the safety analysis report without prior Commission approval, unless the proposed change involves a change in the technical specification or an unreviewed safety question. Changes to the Hydrogen - Oxygen ( $H_2 - O_2$ ) monitoring system as described in the safety analysis report, section 5.2 were made and included a written safety evaluation. The safety evaluation required that during plant operation, the torus access shield plugs must remain installed unless another safety evaluation is made to determine if the cooling water supply to the  $H_2-O_2$  monitor was adequate for a post, loss of coolant environment.

Contrary to the above, on December 2, 1980, the inspector observed that the torus access shield plugs were not installed while Unit 2 was operating at power with no safety evaluation having been performed to determine if the cooling water supply to the Hayes-Republic  $H_2-O_2$  monitor was adequate if a loss of coolant accident occurred.

This is a Severity Level IV Violation (Supplement I.D.1.) applicable to Unit 2.

- B. Technical Specification 6.3.D.2 requires each High Radiation area in which the intensity of the radiation is greater than 1,000 mrem/hr shall be provided with locked doors to prevent unauthorized entry and the keys maintained under administrative control of the Shift Engineer on duty.

Contrary to the above, on December 22, 1980, the door to Unit 3, 3A Reactor Cleanup Pump Room was not locked or guarded to prevent unauthorized entry. This room is posted as a High Radiation area and a radiological survey was conducted on December 16, 1980 and the highest general area radiation reading was 2,000 mrem/hr.

This is a Severity Level V Violation (Supplement I.E.) applicable to Unit 3.

- C. Technical Specification 6.3.A requires detailed written procedures to be prepared, approved and adhered to. Mechanical Maintenance Instruction No. 77 requires that during the replacement of the main steam safety valve the flange gaskets be removed and the flange surfaces be cleaned with a stainless steel wire brush.

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Contrary to the above, on December 19, 1980, the main steam safety valve flange gaskets were not removed nor were the flange surfaces cleaned prior to valve installation.

This is a Severity Level V Violation (Supplement I.E.) applicable to Unit 3.

- D. 10 CFR 50, Appendix B, Criterion XI implemented by Topical Report TVA-75-01, Table 17.2.3 and Operational Quality Assurance Manual, Appendix B, requires in part that, test results shall be documented and evaluated to assure that requirements have been satisfied. Work Plan Nos. 6371 and 7703 (which were issued to install high density spent fuel storage racks into Unit 1 and 3 spent fuel pools) required that: (1) Test results (conducted to assure that neutron absorbing material had been installed) shall be evaluated and verified for acceptability (2) The work plans are to be reviewed for completion by Quality Assurance.

Contrary to the above, an evaluation and verification of the test results had not been performed for Unit 1 fuel storage modules 2, 3, 5, 6, and 7 until December 2, 1980. Spent fuel had been loaded into fuel storage modules 2, 5, and 6 since January 1980. The work plan had not been reviewed for completion by Quality Assurance for the aforementioned fuel storage modules. The work plan for Unit 3 did not have Quality Assurance review accomplished for fuel storage modules 3 and 6. Spent fuel had been loaded into fuel storage module 6 since August 1979. The fuel storage modules were installed September 1978.

This is a Severity Level V Violation (Supplement I.E.) applicable to Units 1 and 3.

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: MAR 10 1981

