

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

June 12, 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:

BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3 - NRC-OIE REGION II INSPECTION
REPORT 50-259/85-18, 50-260/85-18, 50-296/85-18 RESPONSE TO VIOLATION

Enclosed is our response to R. D. Walker's May 13, 1985 letter to
H. G. Parris transmitting IE Inspection Report Nos. 50-259/85-18,
50-260/85-18, and 50-296/85-18 for our Browns Ferry Nuclear Plant which cited
TVA with two Severity Level IV Violations and one Severity Level V Violation.

If you have any questions, please get in touch with R. E. Alsup 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, Chief
Nuclear Licensing Branch

Enclosure

cc: Mr. James Taylor, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ENCLOSURE
RESPONSE
NRC INSPECTION REPORT NOS.
50-259/85-18, 50-260/85-18, AND 50-296/85-18
ROGER D. WALKER'S LETTER TO H. G. PARRIS
DATED MAY 13, 1985

Enclosure

Item 1

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed and performed through documented procedures and instructions which include criteria to determine that important activities are satisfactorily accomplished.

Contrary to the above, TVA has not prescribed or performed certain activities affecting quality through documented procedures and instructions which included criteria to assure they were satisfactorily accomplished. Specific examples are as follows:

- a. Instructions provided for the inspection of check valves in the emergency equipment cooling water system for the diesel generators did not contain inspection requirements nor acceptance criteria.
- b. Documentation of initial inspection results for eight valves, could not be retrieved in two cases (four valves each); in the remaining six cases, the inspection instructions did not require inspection for excessive wear or crud buildup.
- c. Documentation of initial inspection results for two of the inspections, MR A-271179 and -271180, incorrectly identified the piping system.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

2. Reasons For the Violation

The reason for the violation was failure to provide proper details while completing maintenance requests for performing inspection of the check valves. This led to the documentation problems as described in the violation notice. Refer to Item 3 for discussion of the retrievability problem.

3. Corrective Steps Which Have Been Taken and Results Achieved

Future inspections will be performed annually by MMI-6. A revision to MMI-6, Scheduled Maintenance Diesel Generator Units, has been initiated



Item 1 (continued)

to include the inspection requirements and acceptance criteria for the applicable emergency equipment cooling water check valves in the procedure. The MMI-6 initiated revision includes an inspection for excessive wear and crud buildup.

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

The revised maintenance instruction will both identify this piping system and prevent this problem in the future.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by September 1, 1985.



Item 2

10 CFR 50, Appendix B, Introduction and Criterion II, as implemented by TVA Topical Report TVA-TR75-1A, Rev. 8, require that TVA identify the components to which their Quality Assurance (QA) program applies and that the components identified must include all of those which mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public.

10 CFR 50, Appendix B, Criterion XVI, as implemented by Topical Report TVA-TR75-1A, requires the licensee to assure prompt correction of deficiencies.

Contrary to the above, TVA did not correctly identify all of the components to which its QA program should apply and after identification of this deficiency, it was not promptly corrected, in that:

- a. TVA's listing of components to which their QA program applies omits the portion of their emergency equipment cooling water system outside of their secondary containment. As a consequence, components needed to assure that emergency diesel generators are cooled sufficiently to function are not included in the written program. These components are required to mitigate postulated accidents that could cause undue risk to the health and safety of the public. The list is given in the Browns Ferry Final Safety Analysis Report (FSAR), the TVA Operational Quality Assurance Manual, and Browns Ferry Standard Practice BF 1.11. The NRC approved QA program-document references the FSAR list.
- b. TVA was informed of the omission during NRC Inspection 259, 260, 296/84-47, completed November 16, 1984. Over four months later on April 4, 1985, TVA still had not corrected their list.

1. Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

2. Reasons For the Violation

NRC Inspection Report 259, 260, 296/84-50 identified a discrepancy in the critical structures, systems, and components (CSSC) lists of both the Nuclear Quality Assurance Manual (NQAM) and Standard Practice BF 1.11. TVA acknowledged the discrepancy and the compliance staff initiated paperwork to remedy the error. The correction took longer to implement than usual due to competing priorities dealing with NRC and TVA safety related matters.



Item 2 (continued)

3. Corrective Steps Which Have Been Taken and Results Achieved

Standard Practice BF 1.11 was revised to expand the CSSC requirements to include the entire emergency equipment cooling water (EECW) system up to the pressure control valve in the turbine building. In addition, short term NRC concerns similar to the stated item are now being tracked on an immediate attention listing. This increased attention will improve turnaround time on similar NRC concerns.

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

The FSAR will be corrected at the next annual update.

NQAM changes are not required since the CSSC list will be deleted in the near future.

5. Date When Full Compliance Will Be Achieved

Standard Practice BF 1.11 was revised on April 18, 1985. The FSAR change can be made in the update for this year.



Item 3

10 CFR 50, Appendix B, Criterion XVII, as implemented by TVA Topical Report TVA-TR-75-1A, requires that records of activities affecting quality be retrievable.

Records for activities affecting quality were not retrievable in that inspection records for inspections of check valves to DG Coolers D and 3A, reportedly recorded on MRs A-261126 and A-260352, could not be retrieved. The subject inspection records were for inspections conducted in response to IEB-83-03.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

2. Reasons For the Violation

Two of the MRs could not be retrieved after the inspection and have apparently been lost.

3. Corrective Steps Which Have Been Taken and Results Achieved

Corrective Action Report 85-027 has been written to investigate the reason for loss of maintenance records.

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

The corrective measures will determined by Corrective Action Report 85-027 regarding retrievability of maintenance requests.

5. Date When Full Compliance Will Be Achieved

We will notify NRC of our proposed corrective action by September 1, 1985.

