

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

June 21, 1985

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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 50-259/85-23, 50-260/85-23, 50-296/85-23- RESPONSE TO VIOLATION

Enclosed is our response to R. D. Walker's May 21, 1985 letter to  
H. G. Parris transmitting IE Inspection Report Nos. 50-259/85-23,  
50-260/85-23, and 50-296/85-23 for our Browns Ferry Nuclear Plant which cited  
TVA with one Severity Level IV Violation. On June 20, 1985, Bob Alsup of my  
staff and Floyd Cantrell of your staff discussed an extension to June 27, 1985  
for responding to the 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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PDR:

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

PHYSICS 311

LECTURE 10: ELECTROSTATIC POTENTIAL

LECTURE 11: ELECTROSTATIC POTENTIAL

LECTURE 12: ELECTROSTATIC POTENTIAL

LECTURE 13: ELECTROSTATIC POTENTIAL

LECTURE 14: ELECTROSTATIC POTENTIAL

LECTURE 15: ELECTROSTATIC POTENTIAL

LECTURE 16: ELECTROSTATIC POTENTIAL

LECTURE 17: ELECTROSTATIC POTENTIAL

LECTURE 18: ELECTROSTATIC POTENTIAL

LECTURE 19: ELECTROSTATIC POTENTIAL

LECTURE 20: ELECTROSTATIC POTENTIAL

LECTURE 21: ELECTROSTATIC POTENTIAL

LECTURE 22: ELECTROSTATIC POTENTIAL

LECTURE 23: ELECTROSTATIC POTENTIAL

LECTURE 24: ELECTROSTATIC POTENTIAL

LECTURE 25: ELECTROSTATIC POTENTIAL

LECTURE 26: ELECTROSTATIC POTENTIAL

LECTURE 27: ELECTROSTATIC POTENTIAL

ENCLOSURE  
RESPONSE  
NRC INSPECTION REPORT NOS.  
50-259/85-23, 50-260/85-23, AND 50-296/85-23  
ROGER D. WALKER'S LETTER TO H. G. PARRIS  
DATED MAY 21, 1985

Enclosure

Item 1

10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR 50 and the planning standards of 50.47(B). 10 CFR 50.47(b)(15) requires that those who may be called on to assist in an emergency be provided radiological emergency response training. Section 4.1.1 of the Browns Ferry Nuclear Plant Radiological Emergency Plan states, in part, that it is the responsibility of the Site Emergency Director to initially make recommendations for protective actions to State and local agencies if necessary. Section 4.1 of the Plan states that the Shift Engineer on duty may be designated the Site Emergency Director and acts for him until relieved.

Contrary to the above, Shift Engineers' performance during walkthrough interviews indicated that emergency response training was inadequate in the area of protective action decisionmaking. Specifically, the Shift Engineers were not capable of consistently determining when and what type of protective action recommendations were appropriate to protect the health and safety of the public.

This is a Severity Level IV violation (Supplement VIII).

1. Admission or Denial of the Alleged Violation

TVA admits that a violation occurred with the following clarification. The violation was not the consequence of inadequate training of shift engineers in their duties as site emergency directors. TVA does admit that its Protective Action Guide (PAG) differed from the specific guidance contained in NUREG 0654. This procedural content difference, not adequate training, caused the apparent inconsistency of shift engineer response. The shift engineers followed a procedure which did not address two of the problems posed in the walk-through interview. Therefore, there was no possibility of a consistent response.

2. Reasons For the Violation

TVA's PAG did not cover all the specific situations postulated by NUREG 0654.

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Item 1 (continued)

3. Corrective Steps Which Have Been Taken and Results Achieved

A revised PAG recommendation has been prepared and discussed with NRC Region II REP personnel. This revised PAG will be incorporated in the BFN-REP Implementing Procedures Document (IPD). All personnel designated as potential site emergency directors will be thoroughly trained in the use of the revised PAG prior to its incorporation in the BFN-REP-IPD.

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

The steps of No. 3 in conjunction with the established periodic REP retraining will prevent future violations.

5. Date When Full Compliance Will Be Achieved

All personnel designated to serve as site emergency directors will receive training by July 10, 1985. The new PAG will be implemented by July 10, 1985.

BROWNS FERRY RADIOLOGICAL EMERGENCY PREPAREDNESS AUDIT  
 SHIP ENGINEER WALKTHROUGH  
 PROTECTIVE ACTION RECOMMENDATIONS  
 APRIL 17, 1985

PROBLEM NO.	1	2	3	4	5	6	7	8	9	10
Shift Engineer	General Emergency No Data <i>2 ENK charts</i>	Loss of Control of the Plant	Building Release $3.4 \times 10^0$ uCi/sec.	Stack Release $1.8 \times 10^0$ uCi/sec.	Core Melt No Significant Fission Prod. in Containment No Release Likely	Core Melt Significant Fission Prod. in Containment No Release Likely	Core Melt Fission Prod. in Contain. No Release Imminent	Core Melt Fission Prod. in Contain. Release Imminent	EPA Action Guide Problem	EPA Action Guide Problem
A	3	3	-	3	1	2	3	2	3	3
B	2	Standby for Recommendations	3	-	1	2	2	3	3	3
C	Standby to Evacuate	3	-	3	2	2	2	3	3	3
D	3	3	3	-	1	2	2	3	3	3

