

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority  
Browns Ferry 1, 2 and 3

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

The following violation was identified during an inspection conducted on October 15-19, 1984. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

10 CFR 50, Appendix B, Criterion V, as implemented by Topical Report TVA-TR75-1A, requires the licensee to provide appropriate acceptance criteria in instructions to assure that important activities are satisfactorily accomplished.

Contrary to the above, the licensee's instructions for leakage rate tests on pressure isolation valves (surveillance instructions (SIs) 3.2.5 and 4.7.A.2.g-3) do not provide appropriate acceptance criteria for leakage rates in that:

1. Although the instructions provide reference leakage rate acceptance limits that would assure correction of degraded leak tightness for the valves, these limits may be bypassed on the verbal approval of the NDE Level III qualified person, who may permit leakage through redundant pressure isolation valves up to the relief capacity of the relief valves in the lower pressure systems which accept the leakage.
2. The maximum leakage that could be permitted as a result of the above would eliminate the capability of the relief valves to serve their protective functions in subsequent plant operation. They would not protect the lower pressure piping from further increases in leakage or thermal transients that might occur during plant operation - such that low pressure piping component might be degraded or failed, resulting in a loss of coolant outside the primary containment.
3. Permissible leakage might result in raising the temperature of the lower pressure piping above that intended by design.
4. Once accepted, leakage rates as high as the relief capacities of the relief valves could remain unchecked for an entire operating cycle - possibly as long as two years.
5. The criteria used by the NDE Level III test person in determining what limits he should permit were not prescribed or referenced by the instructions.

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

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Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violation; (2) the reasons for the violation 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.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: NOV 19 1984