

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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July 26, 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 50-259/85-06, -260/85-06, -296/85-06 - SUPPLEMENTAL RESPONSE TO
VIOLATION

Please refer to your letter to H. G. Parris dated June 6, 1985, requesting a supplemental response to OIE Inspection report 85-06 for Browns Ferry. We have reviewed your letter and enclosed is a supplemental response which describes actions taken or planned to improve the effectiveness of our management control system. In recent discussions with your staff, we understand violation 4 is being reviewed further by the NRC for applicability. Dave Verrelli of your staff and I discussed an extension for submitting this supplemental response.

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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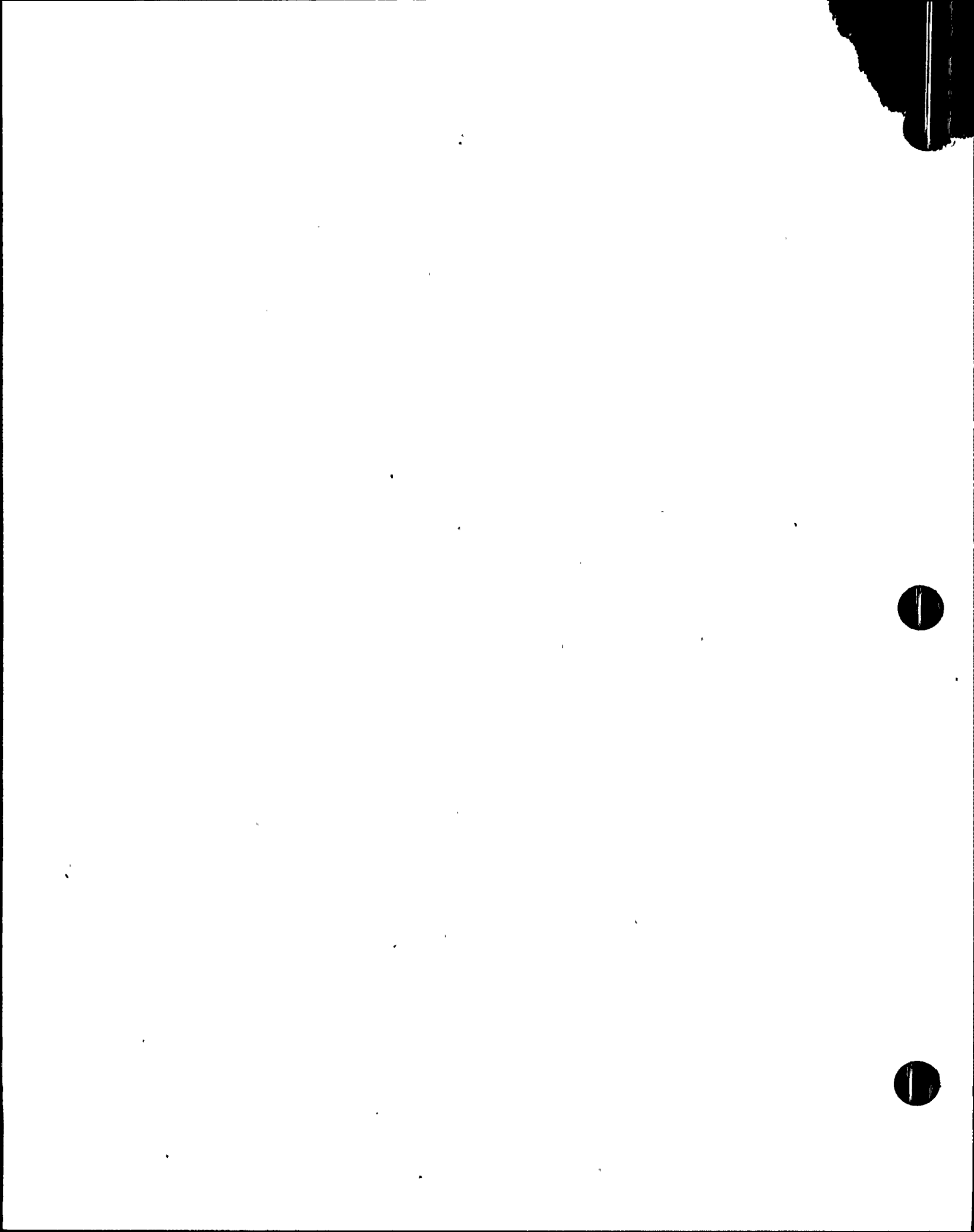
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ENCLOSURE

Browns Ferry management initiated a comprehensive maintenance improvement program during 1984. Improvement in the quality of maintenance activities is being obtained by consolidating all major outage maintenance activities under one group, increasing employee involvement, providing additional job related plant training to personnel, improving maintenance procedures, increasing the quantity of engineering employees, and providing a quality planning and scheduling program. Management involvement in activities is being accomplished by placing a shift maintenance manager on each shift. The following is a brief summary of the major program being implemented at the present time.

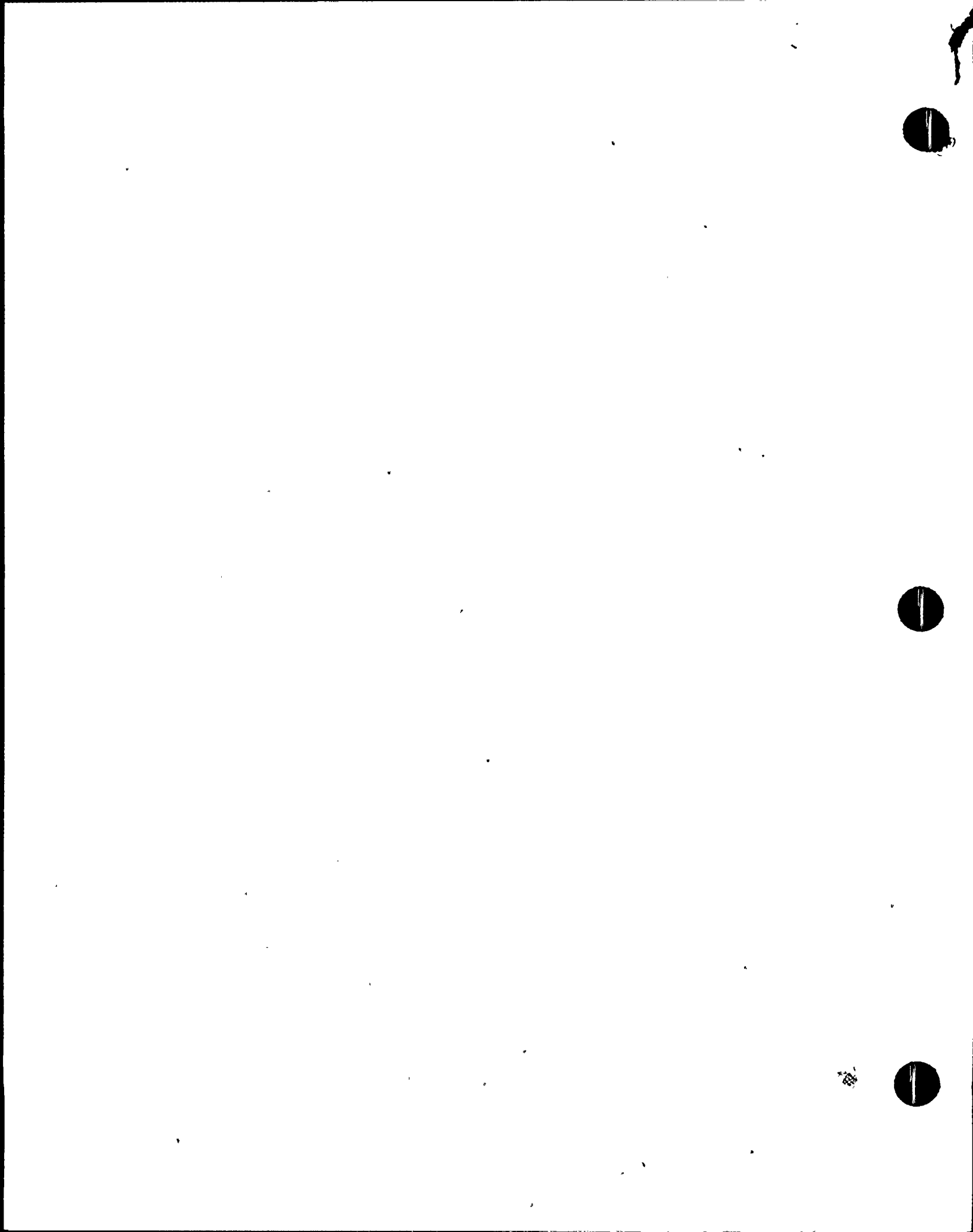
1. Heavy outage maintenance work, turbine floor, refuel floor, valves, traversing incore probe (TIP), local power range monitor (LPRM), recirculation motor generator set and pump motors, and snubbers were transferred to plant maintenance sections for unit 1. Only the refuel floor, turbine work, TIP, LPRM, and recirculation pump motors have been transferred to plant maintenance on unit 2 and unit 3. The remaining work will be transferred at the start of the next outage on both units.
2. Craftsmen in both the electrical and mechanical sections were assigned to a particular unit in November of 1984. A general foreman has been assigned for each specific unit to manage all maintenance activities for their section, both while the unit is operating and during outages. This change has given the craftsmen a sense of ownership and increased their accountability for the work.
3. Maintenance manpower has been redistributed to approximately 60 percent, 25 percent, and 15 percent for second, first, and third shift, respectively, as of May 1985. The goal is to have a 40 percent, 40 percent, and 20 percent distribution. These distributions will fluctuate with outage activities.
4. Engineering design personnel were transferred to the site in November 1984 in order to streamline interface and support effort. Maintenance managers have established a close working relationship with their counterparts in the engineering design group.
5. Maintenance sections have increased the number of engineers and engineering aides/technicians. Maintenance engineering has been located in one area to enhance communication.
6. Training facilities to provide special training have been added to the plant site and staffed with personnel transferred from the Power Operations Training Center. Craftsmen have been selected for assignment to the training staff in all maintenance disciplines. The "real-time" training program, currently being administered by the maintenance section supervisors informs personnel of compliance



6. (continued)

performance, changes to procedures that effect them, and generic problems and events that the maintenance personnel have encountered.

7. Specialized equipment has been bought. MOVATS was received in March 1985. Training of specific engineers and craftsmen in maintenance diagnostic and post maintenance testing of motor operated valves was initiated in May 1985. Other specialized equipment and training will be added as needed.
8. A two-week training program has been implemented to provide systems training for maintenance engineers, foremen, and annual craftsmen.
9. In January 1985, a daily strategic scheduling meeting for each shift was established to ensure that the entire shift is working toward the same schedule with the same priority.
10. Maintenance engineers are receiving specialized systems training to establish better overall understanding of systems on which they work.
11. The maintenance planning and scheduling group was established in March 1984. It is adequately staffed and provides quality work packages (special work permit, permits, and other requirements) and instructions for performing maintenance activities. This group also includes quality assurance and operations members. Additionally, this group publishes a daily schedule of all maintenance activities. They provide surveillance instruction packages to all responsible sections who perform surveillance tests, except operations. This ensures that the latest revisions are used, and the proper supporting procedures are attached. Improvements in communication and establishing of priorities are ongoing.
12. The use of maintenance tracking and maintenance history has been improved since the establishment of the planning and scheduling group. Since November of 1984, the planners and maintenance engineers use this computer data base for maintenance history. The improvement of this system is an ongoing process.
13. We have increased participation and utilization of the Nuclear Plant Reliability Data System (NPRDS) by training responsible personnel in its use. This training was completed in February 1985.
14. Additional second-party verification was incorporated into existing procedures for components that would degrade a safety function or present a safety concern if mispositioned or improperly maintained. The majority of the procedures met a March 1985 target for revision.



15. There is an ongoing review of all existing procedures to ensure accuracy, applicability, compliance, and thoroughness. Maintenance sections are reviewing procedures utilizing both engineers and craftsmen to ensure technical adequacy and usability.
16. In February 1985, the procedure for failure investigation of safety related items was revised to require identification of assigned engineers and a due date for the report, require routing of reports to training, and to provide meshing of Licensee Reportable Event Determination and failure investigation programs.
17. In May 1985, a single maintenance manager on offshifts was established with authority to direct all maintenance on that shift. This position was established to relieve some administrative burden on shift operating personnel, provide consistent priority of maintenance assignment both during the shifts and between shifts, and provide better transfer of status of activities and event investigation between shifts.