

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2, and 3

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

The following violations were identified during an inspection conducted on June 21 - July 26, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification 6.3.A requires that detailed written procedures covering the following items shall be prepared, approved and adhered to:
 - . Normal startup, operation and shutdown of all systems involving nuclear safety of the facility.
 - . Action to be taken to correct specific and foreseen potential malfunctions of systems or components.
 - . Fire protection and prevention procedures

Contrary to the above, this requirement was not met for the two examples that follow:

- a. The licensee failed to prepare adequate written procedures covering the unit cross-connection feature of the Residual Heat Removal (RHR) System as described in paragraphs 4.8.6.4 and F.7.16 of the Final Safety Analysis Report (FSAR). This cross-connection feature allows each unit access to one RHR loop belonging to its physically adjacent unit in order to remove decay heat and residual heat from the reactor core and primary containment in the event of a complete failure of the affected unit's emergency core cooling systems (ECCS). The licensee's existing procedure, Operating Instruction 74, Residual Heat Removal System, was inadequate in that paragraph IV.F, Cross Connecting Between Units, was limited for use in the containment cooling mode only and did not address the reactor core cooling mode. The procedure was additionally inadequate in that it did not require the bypassing of certain RHR suction valve interlocks in the RHR pump start circuitry which would prevent the pumps from starting in the specified cross-tie valve lineup.
- b. The licensee failed to adhere to Operating Instruction 26, High Pressure Fire Protection System for the required system valve lineup. On June 17, 1985, deluge system drain valve 1-26-77-SD was found mispositioned to the open position. The master valve status checklist in the control room indicated the valve was shut which was contrary to the as-found position.

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This is a Severity Level IV Violation (Supplement I) applicable to all three units.

2. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these drawings.

Contrary to the above, the requirement was not met in that the High Pressure Coolant Injection System torus suction valve, 73-27, was not electrically connected in accordance with TVA drawings 45N714-2RB, 45N3711-3RA, and 45N3711-5RA.

This is a Severity Level IV violation (Supplement I) and is applicable to Unit Three.

3. Technical Specification 6.3.A. requires that detailed written procedures, including applicable checkoff lists, shall be prepared, approved, and adhered to for system operation and corrective maintenance which could have an effect on the safety of the reactor.

Procedures were not adhered to or were inadequate in the following examples:

- a. Mechanical Maintenance Instruction (MMI)-28, Control Rod Drive Hydraulic Unit (Repair, Removal, and Replacement), Step 6.3 requires that the maintenance request contain the functional and post maintenance test requirements as specified in the MMI Testing Section and that the maintenance foreman ensure these test requirements are performed and signed off.

Contrary to the above, MR A126652, completed February 20, 1985, on Unit 1 Control Rod Drive Module 34-03 did not contain the functional and post maintenance test requirements consisting of insertion and withdrawal timing. Additionally, the responsible foreman did not ensure the required testing was performed and signed off.

- b. MMI-28, Section 10.3, and Browns Ferry Operating Instruction (OI)-85, Control Rod Drive System, Section 3.H.1.e./2.e., require that control rod insertion and withdrawal times be 48 ± 3 seconds.

Contrary to the above, during control rod timing checks on February 22, 1985, rod withdrawal and insertion times of 41 and 53 seconds respectively for Unit 1 Control Rod 34-03 were accepted as satisfactory.

- c. OI-85, Section 3.D.9, requires that if control rod drive water pressure is increased above normal limits (260 psi greater than reactor pressure) to initially move a rod from the fully inserted position, then it should be returned to normal before a rod passes the O2 notch position in order to prevent double notching in high rod worth regions.



Contrary to the above, on February 22, 1985, Unit 1 control rod 34-03 was withdrawn past notch position 02 with drive water pressure approximately 50 psi above normal limits.

- d. Standard Practice 17.18 requires a safety evaluation of changes to safety related equipment that remain following completion of a maintenance activity to provide the basis for a determination that the change did not involve an unreviewed safety question.

Contrary to the above, this requirement was not met in that, when failed open resistors on both High Pressure Coolant Injection (HPCI) steam line drain isolation valves' (73-6A and 73-6B) solenoid field suppression circuits were found during maintenance activity on March 8, 1985, no safety evaluation was performed to determine the operability of the HPCI system under this potentially degraded condition. The resistors were not replaced and the HPCI system was not evaluated during power operation until the unit was shutdown on March 19, 1985.

This is a Severity Level IV violation (Supplement I) and is applicable to all units.

4. 10 CFR 50, Appendix B, Criterion XII requires that measures shall be established to assure that measuring and test equipment (M&TE) used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits. Part III, Section 3.1 of the TVA Nuclear Operations Quality Assurance Manual (N-OQAM) implements these requirements.

Contrary to the above, the licensee failed to adhere to the requirements of Part III, Section 3.1 of the N-OQAM as indicated by the following examples:

- a. The accountability of the utilization of the M&TE used as working standards by the Mechanical Maintenance small tool repair and calibration shop was not documented as required by paragraph 2.3.2 of the N-OQAM.
- b. The assigned calibration interval for M&TE was not adequately based upon experience available through historical calibration performance records as required by paragraph 3.2.1 of the N-OQAM in the following two examples:
- (1) Oscilloscope number 251425 was found out-of-tolerance on its last five annual calibrations (11/5/80, 10/26/81, 10/19/82, 10/21/83 and 10/19/84), yet, each out-of-tolerance investigation report either did not address the calibration interval or concluded that the interval was adequate.
 - (2) Pressure gage number E00895 was found out-of-tolerance on two consecutive semi-annual calibrations (2/29/84 and 8/28/84), yet, the out-of-tolerance investigation reports failed to address the

adequacy of the calibration interval as required by the out-of-tolerance notice.

This is a Severity Level V Violation (Supplement I) applicable to all 3 units.

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 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.

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: AUG 7 1985