

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

85 SEP 24 A 8:48

September 18, 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:

Please refer to J. A. Domer's letter to you dated June 21, 1985, which contained our response to OIE Inspection Report 85-25 for our Browns Ferry Nuclear Plant. As a result of discussions with Floyd Cantrell of your staff, we have revised our response to Violation 1.d, which is enclosed.

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

R. H. Shell

R. H. Shell
Nuclear Engineer

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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REVISED RESPONSE
NRC INSPECTION REPORT NOS.
50-259/85-25, 50-260/85-25, AND 50-296/85-25
DAVID M. VERRELLI'S LETTER TO H. G. PARRIS
DATED MAY 22, 1985

Example d.1

Technical Specification 6.3.A.6 requires that detailed written procedures covering surveillance and testing requirements be adhered to.

Contrary to the above, Plant Standard Practice BF 14.25, Clearance Procedure, was not followed in that all electrical power was not isolated from the 2DA low pressure coolant injection (LPCI) motor-generator set under hold order 85-150A. The motor was removed with voltage (18 volts) still applied to the thermistor leads. On April 23, 1985, the inspectors observed that various indicating lights were still illuminated although hold order tags were in place.

1. Admission or Denial of the Alleged Violation

TVA disagrees that this example is a violation.

2. Reasons For the Violation

The 2DA low pressure coolant injection (LPCI) motor generator (MG) set was tagged to pull the generator for transport to Louis-Allis Company for repair. The equipment was tagged in accordance with Standard Practice 14.25 for this job. The electrical maintenance personnel felt the clearance was sufficient and safe to do work, and the shift engineer issuing the clearance felt it was adequate to safely perform the work. Involved personnel were aware of limitations, conditions, and boundaries of this clearance. This meets the intent and purpose of BF 14.25. The 18-volt thermistor power supply is shared with the 2EN LPCI MG set, and there is no way to provide isolation if the other MG set is to remain operable. The maintenance personnel did not request this circuit tagged because they could safely handle the wiring by lifting the leads "hot." This is commonly required and done on systems with common low voltage power supplies. This circuit was subsequently tagged, but this was for NRC inspectors concern rather than a safety concern of personnel doing the work. The basis of this violation is related to the wording of BF 14.25. Although we believe the directions provided in the procedure were adequate, we have reworded BF 14.25 to unambiguously assure a uniform understanding on the clearance procedure.

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