

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower⁸⁵⁰² II,

October 3, 1985: 30

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 50-259/85-39, 50-260/85-39, 50-296/85-39 - RESPONSE TO VIOLATION

Enclosed is our response to R. D. Walker's September 4, 1985 letter to
H. G. Parris transmitting IE Inspection Report Nos. 50-259/85-39,
50-260/85-39, and 50-296/85-39 for our Browns Ferry Nuclear Plant which cited
TVA with one Severity Level IV Violation and one Deviation.

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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RESPONSE
NRC INSPECTION REPORT NOS.
50-259/85-39, 50-260/85-39, AND 50-296/85-39
ROGER D. WALKER'S LETTER TO H. G. PARRIS
DATED SEPTEMBER 4, 1985

Item 1

Technical Specification 6.3.A.1 requires that detailed written procedures, including applicable checkoff lists, shall be prepared, approved, and adhered to for normal startup, operation and shutdown of all systems and components involving nuclear safety of the facility.

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

Example 1a

Operating Instruction OI-65, Standby Gas Treatment (SBGT) System Operation did not address that the charcoal bed heaters had to be manually reset after the SBGT system was secured. Although Licensee Event Report 259/85-29 implies this was not previously known, Final Safety Analysis Report Figure 5.3-9 note six describes the manual reset.

1. Admission or Denial of the Alleged Violation

TVA admits the violation.

2. Reasons For the Violation

Cognizant plant personnel were not aware of the necessity to manually reset the heaters even though Final Safety Analysis Report (FSAR), Figure 5.3-9, Note 6, describes the function. Cognizant personnel were made aware of the necessity to manually reset the heater control switch after a TVA review of the SBGT control circuitry discovered the requirement.

3. Corrective Steps Which Have Been Taken and Results Achieved

The SBGT control board was tagged with a caution order to instruct the operator to reset the heater logic after securing the SBGT system. After further investigation, an engineering evaluation concluded that Technical Specification 4.7.B.2.d, which requires the operation of each SBGT train for at least 10 hours each month with the associated relative humidity heaters operating, obviates the need for these charcoal heaters. The heaters have subsequently been tagged out and a design change has been initiated to permanently remove these heaters from the SBGT system design.



Example 1a (continued)

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

Long-term corrective action is committed to in Licensee Event Report (LER) 259/85029 R1 and will consist of the permanent removal of the heaters and revising the FSAR to reflect the new configuration.

5. Date When Full Compliance Will Be Achieved

Revise FSAR in annual update (July 1986) and remove heaters in accordance with commitment in LER.

Example 1b

On July 30, 1985, Surveillance Instruction SI 4.7.B-1, SBT Operability Test was being used which did not contain a change dated July 7, 1985, that required the charcoal bed heaters to be reset after system shutdown. A review of completed SI 4.7.B-1 procedures since the change was implemented found three out of 10 did not contain the change. Operations personnel are instructed by Operations Section Instruction Letter SIL-40 to compare page-by-page procedures used against a controlled copy of the procedures to insure revisions are incorporated.

1. Admission or Denial of the Alleged Violation

TVA admits the violation.

2. Reasons For the Violation

SI 4.7.B-1, SBT Operability Test, was being run for an instrument check. The change dated July 7, 1985, did not require a permanent procedure change therefore, it should not have been included with any data sheets.

3. Corrective Steps Which Have Been Taken and Results Achieved

The change dated July 7, 1985, has been removed and will not be included with any future SI 4.7.B-1 data sheets. OSIL-40 has been revised to include the requirement that the back of a surveillance coversheet be stamped and signed, verifying all pages in the data sheet package have been compared to official control room instructions.

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

Actions described in step 3 should be sufficient to prevent future recurrences.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.



Deviation

Final Safety Analysis Report (FSAR) section 5.3.3.7, Standby Gas Treatment (SBGT) System, states that the charcoal bed temperature is thermostatically controlled with high and low temperature alarms in the Control Room.

Contrary to the above, no low temperature alarm existed for the charcoal bed temperature. No other means was established to insure the SBGT heaters were operable. When the operability of the heaters was questioned by the inspector, train B and train C were found not to be operating properly.

1. Corrective Steps Which Have Been Taken and Results Achieved

As stated in LER 259/85029 RI, the FSAR was in error on the existence of low-temperature alarms. Also, a design evaluation performed by TVA concluded that Surveillance Requirement 4.7.B.2.d, which requires the operation of each SBGT train for at least 10 hours a month with the relative humidity heaters operating, obviates the need to keep the charcoal bed heaters. As a result, a low temperature alarm is also not required since the charcoal bed heater operability is no longer required.

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

FSAR, Section 5.3.3.7, Standby Gas Treatment System, will be revised to reflect the actual configuration of the SBGT trains.

3. Date When Full Compliance Will Be Achieved

Revise FSAR in annual update (July 1986).

