

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

DEC 30 1986

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555

Attention: Dr. J. Nelson Grace

In the Matter of )  
Tennessee Valley Authority )

Docket Nos. 50-259  
50-260  
50-296

BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3 - NRC-OIE REGION II INSPECTION  
REPORT NOS. 50-259/86-34, 50-260/86-34, AND 50-296/86-34 RESPONSE TO VIOLATION

Enclosed is our response to G. G. Zech's December 5, 1986 letter to  
S. A. White transmitting IE Inspection Report Nos. 50-259/86-34, 50-260/86-34,  
and 50-296/86-34 which cited TVA with one Severity Level IV Violation for our  
Browns Ferry Nuclear Plant.

If you have any questions, please get in touch with M. J. May at  
(205) 729-3566.

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, Assistant Director  
Nuclear Safety and Licensing

Enclosure

cc: See page 2

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Add:  
G. Zech



U.S. Nuclear Regulatory Commission

DEC 30 1986

cc (Enclosure):

Mr. James M. Taylor, Director  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Washington, D.C. 20555

Mr. G. G. Zech, Director  
U.S. Nuclear Regulatory Commission  
TVA Projects  
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Browns Ferry Nuclear Plant  
P.O. Box 2000  
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RESPONSE  
NRC INSPECTION REPORT NOS.  
50-259/86-34, 50-260/86-34, AND 50-296/86-34  
G. G. ZECH'S LETTER TO S. A. WHITE  
DATED DECEMBER 5, 1986

VIOLATION

During the Nuclear Regulatory Commission (NRC) inspection conducted on October 6-10, 1986, a violation of NRC requirements was identified. The violation involved welders qualified to a combination procedure where the record did not show the amount of weld metal deposited by each of the weld processes used. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violation is listed below:

Paragraph (a) (1) of 10 CFR 50.55 (a) requires that structures and components be fabricated to quality standards commensurate with the importance of the safety function. ASME Code Section IX, 1980 edition, paragraph QW-306 states in part that, for combination qualifications in a single test coupon, the limits for thicknesses of deposited weld metal ...shall be considered individually for each process used. The welder qualified in combination on a single test coupon is qualified to weld within his limits of qualification with each specific process.

Contrary to the above, on October 9, 1986, the qualification records of eight welders qualified to a combination weld procedure did not show the amount of weld metal deposited by each of the weld processes used; and therefore, it was not possible to verify the limits of qualification with each specific process.

This is a Severity Level IV violation.

1. Admission or Denial of the Alleged Violation (or Finding)

TVA admits the violation.

2. Reasons For the Violations (or Finding) if Admitted

The TVA Browns Ferry Nuclear Plant (BFN) Welding Performance Qualification Record does not state the thickness range for each process when using the GT-SM combination detail welding procedure.

The combination welder qualification test was deleted from the General Construction Specification on June 12, 1981. At that time, BFN discontinued using the combination welder qualification test. However, BFN accepted and transferred combination welder performance qualification test records from other sites using qualification tests performed before the June 12, 1981 discontinuation of combination GT-SM tests.



3. Corrective Steps Which Have Been Taken and Results Achieved

Retesting of all active welders at BFN who had a GT-SM combination test was completed October 31, 1986. The new tests were to a GT process and SM process with thickness limitation on each welding performance qualification record. Also QC verifies the welders qualification including thickness limitation.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations (or Findings)

BFN will not accept any GT-SM combination test from other TVA sites.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

