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SUBJECT: Forwards response to NRC 890810 ltr violations noted in
 Insp Repts 50-259/89-17 & 50-260/89-17 & 50-296/89-17.

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SEP 11 1989

U.S. Nuclear Regulatory Commission
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Gentlemen:

In the Matter of)
Tennessee Valley Authority)

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

BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 NRC INSPECTION REPORT
Nos. 50-259/89-17, 50-260/89-17, AND 50-296/89-17 - RESPONSE TO VIOLATIONS

This letter provides TVA's response to the letter from B. A. Wilson to
O. D. Kingsley, Jr., dated August 10, 1989, which transmitted the subject
report. The report cited TVA with two violations.

Enclosure 1 provides TVA's response to these violations. A summary list of
commitments is provided in Enclosure 2.

Please refer any questions concerning this submittal to Patrick P. Carier,
BFN, Site Licensing, (205) 729-3570.

Very truly yours,

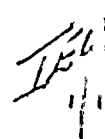
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M. O. Medford, Vice President
and Nuclear Technical Director

Enclosures
cc: See page 2

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SEP 11 1989

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ENCLOSURE 1

RESPONSE - BROWNS FERRY NUCLEAR PLANT (BFN)
NRC INSPECTION REPORT
NOs. 50-259/89-17, 50-260/89-17, AND 50-296/89-17
LETTER FROM B. A. WILSON TO O. D. KINGSLEY, JR.
DATED AUGUST 10, 1989

Violation 1

10 CFR 50.59 allows modifications to the facility as described in the Final Safety Analysis Report (FSAR) provided that a written safety evaluation supports the determination that the modification will not result in an unreviewed safety question.

Nuclear Engineering Procedure 6.6, which implements 10 CFR 50.59 Safety Evaluation (SE) requirements, requires that a written SE be performed for modifications to the facility as described in the FSAR.

Contrary to the above, Design Change Notice (DCN) H3858A, Engineering Change Notice (ECN) P7113, and DCN H0166A, which modified the facility as described in the FSAR, were processed without a written SE to provide the basis that an unreviewed safety question was not being created.

TVA's Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

2. Reasons for the Violation if Admitted

The cause of this violation concerning ECN P7113 and DCN H0166A was inadequate wording in procedures related to screening reviews used for determining if a SE is required. Prior to April 1989, the screening review form required the preparer to address whether the proposed change involved a change in the facility from that described in the safety analysis report (SAR) which could impact nuclear safety. Since these change notices were determined to not impact nuclear safety, it was concluded that a SE was not required.

Failure to perform a SE for DCN H3858A was due to personnel error in that the issue of review was outside the screening review preparer's area of expertise and contrary to procedural requirements the individual did not obtain technical assistance.

3. Corrective Steps Which Have Been Taken and Results Achieved

The screening reviews for the cited change notices were performed before April 1989. Since that time improvements have been made in both the 10 CFR 50.59 review procedures and training. Corporate and site procedures have been revised to more clearly describe in the screening review process the requirement for a SE for those changes made to the facility as described in the SAR.



The training program for qualifying preparers has been expanded to include more time for discussion of evaluation examples and a more detailed SE writing workshop with a greater emphasis on technical content. Also, the requirements for successfully completing this training have been made more stringent. The procedures and training continue to emphasize the importance of obtaining technical assistance, as required, during the review process. The SE for ECN P7113 has been completed and concluded that no unreviewed safety questions exist for this modification. The corporate procedure for evaluating changes as required by 10 CFR 50.59 has recently been revised to incorporate industry guidance from Nuclear Safety Analysis Center (NSAC) 125, Guidelines for 10 CFR 50.59 SEs, and to include additional levels of review and quality assurance monitoring of the process.

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

TVA plans to review previously closed change packages to ensure that changes to the facility as described in the SAR are properly documented. The review will be part of the UFSAR verification program and will involve reviewing those change notices closed after the January 1988 cut-off date for inclusion in the last BFN FSAR update and before April 1989. This effort will be completed in support of the next UFSAR annual update (Amendment 7).

The SEs for DCN H0166A and DCN H3858A will be performed to properly document that no unreviewed safety question exists for these modifications.

5. Date When Full Compliance Will be Achieved

The review of change packages closed between January 1988 and April 1989 will be completed in support of the next UFSAR annual update (Amendment 7). The SEs for DCN H0166A and DCN H3858A will be completed by October 13, 1989.

Violation 2

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, four examples of a failure to properly implement written procedures are identified below:

- a. ECN E-2-P7010 was invalidated by the issuance of DCN H1239 Revision A, which is contrary to procedure PI 86-03, which did not permit use of a DCN to correct an ECN for which a 10 CFR 50.59 review is not valid.
- b. Intent changes to workplans (WPs) including change number two to WP 2317-88 and multiple changes to WP 2069-88, were incorrectly classified as non-intent changes and were not processed in accordance with the requirements of Site Director Standard Practice (SDSP) 8.2.



Violation 2 (Continued)

- c. The torque switch and limit switch settings for valve 2-FCV-71-34 were modified by WP 2181-88 and the required seat leak testing was not specified as required by SDSP 8.4.
- d. During the field work for WP 2194-88, the leads to the unit 2 reactor water clean-up pump motor were reversed from that shown on the original design without processing a design change (i.e., field change) as required by SDSP 8.4.

TVA's Response - Example a1. Admission or Denial of the Alleged Violation

TVA admits this example as stated.

2. Reason for the Violation if Admitted

The cause of the violation was personnel error in that the decision was made to expedite work activities by issuing a DCN instead of correcting the calculation errors on thermal overload sizing for the existing ECN as required by procedure.

3. Corrective Steps Which Have Been Taken and Results Achieved

When the problem with the calculations for ECN E-2-P7010 was identified, engineering issued a letter to modifications to prevent installation of incorrectly sized thermal overloads. Subsequently, the WP for this modification was cancelled. ECN E-2-P7010 has been cancelled.

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

Engineering currently reviews contractor prepared design packages before approval and issuance. Although this practice will not directly correct the cause of the violation it will prevent situations from occurring which could contribute to this type of error.

5. Date When Full Compliance Will be Achieved

Full compliance has been achieved.

TVA's Response - Examples b and d1. Admission or Denial of the Alleged Violation

TVA admits these examples as stated.

2. Reasons for the Violation if Admitted

The cause of these violations was personnel error in that the changes to the WPs were incorrectly determined to be non-intent changes. A contributing factor was the inadequate definitions for intent and non-intent changes provided in the procedure. Although the non-intent changes were used in error, no technical problems were identified. Non-intent changes received the same review and approval as intent changes before the systems were returned to service. However, for non-intent changes, approval did not occur until after the work had been completed.

3. Corrective Steps Which Have Been Taken and Results Achieved

SDSP 8.4 has been revised to delete the use of non-intent changes. Changes to workplans now receive review and approval before the physical work is performed. A change to drawing 2-45N2748-4 has been initiated to reflect the as-installed condition of the pump motor leads in WP 2194-88.

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

SDSP 8.4 should prevent future violations of this type from occurring.

5. Date When Full Compliance Will be Achieved

Full compliance has been achieved.

TVA's Response - Example c1. Admission or Denial of the Alleged Violation

TVA admits this example as stated.

2. Reasons for the Violation if Admitted

The violation occurred due to an inadequacy in the method for documenting post modification test requirements related to 10 CFR 50 Appendix J. The form used to document review of testing requirements required only that the reviewer identify if the change affected the Appendix J program. Since this modification was performed on a valve already included in the Appendix J program the form was correctly marked to indicate that the change did not affect the program. It was understood by the reviewer that the testing would be performed as part of the Appendix J program prior to startup. If the modification had been to add a valve which was required to be tested in accordance with Appendix J, the form would have been marked to indicate that the change did affect the Appendix J program. In summary, the form did not specifically address if testing was required per Appendix J.



3. Corrective Steps Which Have Been Taken and Results Achieved

The review form 243 in SDSP 8.10, has been revised to specifically address Appendix J testing requirements.

4. Corrective Actions Which Will be Taken

SDSP 17.2, Post Modification Test Program, is being revised to provide additional guidance on the minimum testing requirements that must be addressed for specific modifications. Additionally, SDSP-8.4, Modification Workplans, is being revised to more clearly describe required documentation of testing conducted as a result of a modification.

5. Date When Full Compliance Will be Achieved

The modification review form SDSP-243 has been revised. The changes to procedure SDSP 17.2 and SDSP-8.4 will be completed by October 2, 1989.



Enclosure 2

Summary List of Commitments

1. The review of change packages closed between January 1988 and April 1989 will be completed in support of the next Updated Final Safety Analysis Report annual update (Amendment 7).
2. The safety evaluations for Design Change Notice (DCN) H0166A and DCN H3858A will be completed by October 13, 1989.
3. The changes to procedure Site Director Standard Practice (SDSP) 17.2 and SDSP-8.4 will be completed by October 2, 1989.

