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 MEDFORD, M.O. Tennessee Valley Authority
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SUBJECT: Responds to NRC 900326 ltr re violations noted in Insp Repts
 50-259/89-56, 50-260/89-56 & 50-296/89-56.

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APR 25 1990

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

Gentlemen:

In the Matter of
Tennessee Valley Authority

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

BROWNS FERRY NUCLEAR PLANT (BFN) - NRC INSPECTION REPORTS NOS. 50-259/89-56,
50-260/89-56, AND 50-296/89-56 - RESPONSE TO NOTICE OF VIOLATION

This letter provides TVA's response to the notice of violation transmitted by letter from B. A. Wilson to O. D. Kingsley, Jr. dated March 26, 1990. NRC cited TVA with a Severity Level IV violation pertaining to calibration of measuring and test equipment (M&TE). In the example given, two pieces of M&TE were not calibrated with a standard at least four times as accurate as the M&TE being calibrated. A justification for use of the M&TE was not documented by responsible management as required by procedure. TVA has reviewed this event and is taking appropriate corrective actions.

Enclosure 1 contains TVA's response to the notice of violation. The violation is discussed along with the corrective actions taken. Enclosure 2 is a listing of the commitments made in this response.

If you have any questions regarding this response, please contact Patrick P. Carrier at (205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark O. Medford
Mark O. Medford, Vice President
Nuclear Technology and Licensing

Enclosures
cc: See page 2

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FOR ADCK 05000259
Q PDC

U.S. Nuclear Regulatory Commission

APR 25 1990

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ENCLOSURE 1

RESPONSE - BROWNS FERRY NUCLEAR PLANT (BFN)
NRC INSPECTION REPORT
NOS. 50-259/89-56, 50-260/89-56, AND 50-296/89-56
LETTER FROM B. A. WILSON TO O. D. KINGSLEY, JR.
DATED MARCH 26, 1990

Violation

10 CFR 50, Appendix B, Criteria V, as implemented by TVA Topical Report TVA-TR75-1A, requires compliance with procedures. Procedure SDSP-29.1 states that measuring and test equipment must be calibrated with standards which are at least four times as accurate as the equipment being calibrated. It permits use of measuring and test equipment not meeting this requirement if the basis for acceptance is documented and authorized by responsible management.

Contrary to the above, on January 9, 1990 this procedure requirement had not been met for Browns Ferry measuring and test equipment in that two pressure gauges (Serial Nos. US-TVA-522068 and 517116) had been released for use even though records on site showed that the four times accuracy requirements had not been met in the calibration and no justification for use had been documented by responsible management.

TVA's Response

1. Admission or Denial of the Violation

TVA admits the violation.

2. Reason for the Violation

This violation has been attributed to inadequate administrative controls. SDSP 29.1 "Control of Measuring and Test Equipment," required that M&TE be calibrated by standards that are at least four times as accurate as the equipment being calibrated. Deviations from this requirement were allowed if the basis for acceptance was documented and authorized. However, SDSP 29.1 did not provide adequate guidance for the implementation of this process. As a result, M&TE which did not meet this requirement were issued for use without appropriate justification and authorization.

3. Corrective Steps Which Have Been Taken and Results Achieved

SDSP 29.1 has been revised to provide guidance on the process to evaluate M&TE that was not calibrated with a standard four times more accurate. Subsequent management review of SDSP 29.1 has identified additional changes that are needed to improve the process. These changes will ensure that calibrated M&TE received at BFN that does not meet the four to one calibration ratio and has not been calibrated by a state-of-the-art standard will be evaluated prior to use.

For the two pressure gauges specifically identified in this violation, a recalculation of the accuracy of the standard used in their calibration was performed. This recalculation demonstrated that the calibration standard was actually four times as accurate as the two pressure gauges.

A review of other M&TE in use at BFN has been performed to determine if any generic implications existed. As a result of this review, additional M&TE was identified to be evaluated. A Condition Adverse to Quality Report was initiated to track the corrective actions.

An evaluation process is in progress to determine the effects of these discrepancies on plant equipment. Approximately 270 pieces out of 3000 pieces of M&TE in use at BFN have been identified with this type discrepancy. A sample of M&TE will be evaluated by reviewing their use logs and assuring that their uses have been acceptable. Based upon the results of this sample, evaluations will be performed as necessary. The M&TE evaluated to date has determined that all their uses have been acceptable.

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

Future cases in which calibrated M&TE received by BFN do not meet the four to one calibration ratio will be justified and authorized prior to their use. M&TE currently in use that does not meet this requirement will continue to be evaluated as discussed above.

5. Date When Full Compliance Will be Achieved

The evaluation process of M&TE currently in use that does not meet the four to one calibration accuracy requirement will be completed prior to Unit 2 fuel load. Administrative controls resulting from these reviews will be implemented prior to Unit 2 fuel load.

ENCLOSURE 2

RESPONSE - BROWNS FERRY NUCLEAR PLANT (BFN)
NRC INSPECTION REPORT
NOS. 50-259/89-56, 50-260/89-56, AND 50-296/89-56
LETTER FROM B. A. WILSON TO O. D. KINGSLEY, JR.
DATED MARCH 26, 1990

COMMITMENTS

1. The evaluation process for the M&TE that does not currently meet the four to one calibration accuracy will be completed prior to Unit 2 fuel load.
2. Administrative controls resulting from the reviews will be implemented prior to Unit 2 fuel load.