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 MEDFORD, M.O. Tennessee Valley Authority
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 901024 ltr re violations noted in Insp Repts
 50-259/90-27, 50-260/90-27 & 50-296/90-27. Corrective actions:
 each individual holdpoint violation documented through
 condition adverse to quality rept program.

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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. 50-259/90-27, 50-260/90-27, AND 50-296/90-27 - RESPONSE TO VIOLATION

This letter provides TVA's response to the letter from B. A. Wilson to O. D. Kingsley, Jr. dated October 24, 1990, which transmitted the subject report. The report cited TVA with a violation for bypassing Quality Control (QC) holdpoints during maintenance and modification work activities. Fourteen examples of bypassing documented QC holdpoints were identified by TVA's Site Quality organization with five examples in August 1990. TVA admits this violation.

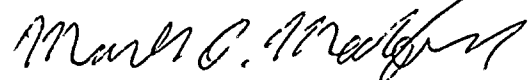
TVA has also included in this letter two examples of bypassed holdpoints that have occurred since August 1990. As agreed with the NRC Resident's Office, this revised response will be issued by January 14, 1991.

Enclosure 1 provides TVA's response to the violation. Enclosure 2 is a summary of the Conditions Adverse to Quality Reports identified in the inspection report, and two that occurred since August 1990. Enclosure 3 is a listing of the commitments made in the response.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY



Mark O. Medford, Vice President,
Nuclear Assurance, Licensing &
Fuels

Enclosures
cc: See page 2



U.S. Nuclear Regulatory Commission

DEC 18 1980

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ENCLOSURE 1

REPLY TO NOTICE OF VIOLATION
BROWNS FERRY NUCLEAR PLANT
NRC INSPECTION REPORT NOS. 50-259/90-27,
50-260/90-27, and 50-296/90-27

During the NRC inspection conducted August 18 - September 15, 1990, NRC identified a violation of regulatory requirements. The violation involved the bypassing of Quality Control (QC) holdpoints during maintenance and modifications work activities. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation states:

Technical Specification (TS) Section 6.8.1, Procedures, requires that written procedures shall be established, implemented and maintained covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33 includes administrative procedures and procedures for controlling repair activities of safety-related equipment.

Site Directors Standard Practice 3.11, Quality Control Inspection Program, Section 3.1.2.e.1 requires that during work instruction preparation inspection planning will include holdpoints and notification points sufficient to provide opportunity for witness/inspection of specified activities. SDSP-3.11, Attachment A requires that the work activity shall not progress past the Quality Control inspection holdpoint until signed as accepted by an inspector or until the Site Quality Management or his designee's consent to continue is obtained and documented.

Contrary to the above, between January 18, 1990 and September 1, 1990, the requirements were not met in that fourteen examples of bypassing documented QC holdpoints were identified by the licensee's Site Quality Organization. Five examples occurred in August 1990.

This is a Severity level IV violation (Supplement I) applicable to all three units.

TVA's Response

1. Admission or Denial of the Violation

TVA admits the violation.

2. Reason for the Violation

This violation occurred as a result of personnel errors. TVA bases this conclusion on the root cause analysis performed for the resolution of each holdpoint violation. These errors were the result of lack of attention to detail by craft personnel during implementation of workplans.



A contributing factor for these events was the significant amount of work being performed at BFN. From January 1990 to August 1990 an excess of 59,000 inspections were performed. Between March and July 1990 the average rate of bypassed QC holdpoints was two per month. In August 1990 the number increased to five. At that time, TVA concluded that a potential adverse trend existed.

3. Corrective Actions Taken and Results Achieved

Each individual holdpoint violation has been documented through the Condition Adverse to Quality Report (CAQR) program. The corrective actions for each QC holdpoint violation were documented in a CAQR and are provided in Enclosure 2. Also included is an assessment of impact on hardware resulting from these noncompliances.

In each instance for craft personnel who bypassed QC hold points, appropriate disciplinary actions have been taken. Specifically, individuals have received oral warnings. As the problem with bypassing holdpoints continued, TVA management expanded the personnel policy to include suspensions and demotions, and ultimately to termination of employment. TVA's disciplinary policy has resulted in no individual continuing to bypass QC holdpoints following initial disciplinary action. Additionally, the modifications manager has held discussions with modifications personnel to stress the importance of holdpoint compliance.

The following two examples of bypassed QC holdpoints have been identified since August 1990. Example 1, CAQR BFP 900364, which occurred on October 31, 1990. In this example a QC holdpoint was bypassed during breaching of Appendix R penetration for cable installation. Example 2, CAQR 900368, which occurred on November 3, 1990. In this example a QC holdpoint was bypassed during welding activities.

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

Nonconformances will be addressed and documented by the CAQR program. The corrective action for bypassed holdpoints will be tracked and documented by the CAQR program. TVA considers that the expanded disciplinary action policy has reversed the adverse trend.

Additionally, corrective actions necessary to close the two examples of bypassed QC holdpoints, CAQRs BFP900364 and BFP900368, will be implemented.

5. Date When Full Compliance Will be Achieved

TVA considers that with implementation of the expanded disciplinary action policy, revised procedures, and tracking of bypassed holdpoints on CAQRs, TVA has programmatically achieved compliance with this violation.

Additionally, to achieve full compliance with this violation, the corrective actions necessary to close the two additional examples of bypassed QC holdpoints will be implemented. Implementation of the corrective action will be completed prior to Unit 2 startup.



ENCLOSURE 2

REPLY TO NOTICE OF VIOLATION
BROWNS FERRY NUCLEAR PLANT
NRC INSPECTION REPORT NOS. 50-259/90-27
50-260/90-27 and 50-296/90-27

CAQR NUMBER	DATE OCCURRED	DATE REPORTED	DESCRIPTION OF CONDITION	CORRECTIVE ACTION	ASSESSMENT OF HARDWARE
BFP 890562P	06/28/89	06/29/89	Foreman failed to notify QC of weld fitup prior to initiation of root pass.	Personnel involved were counselled.	Based on the final visual inspection of the weld, the weld was determined acceptable.
BFP 890735	10/14/89	10/15/89	QC holdpoint was bypassed during installation of a penetration seal.	1) Seal material was removed and replaced. 2) Personnel involved were counselled.	The seal was evaluated and determined adequate however, to be conservative the seal was removed and replaced.
BFP 890776	11/18/89	11/18/89	Cable was lifted and removed from conduit without QC presence.	Personnel involved were counselled.	Cables were examined and determined acceptable.
BFP 890780	11/20/89	11/21/89	Welding was performed without a detailed weld procedure; no base material listed, no fitup inspection holdpoint, and qualified welders were not listed on weld data sheets.	1) Weld repair data sheet was issued. 2) Filler material control program was reviewed. 3) Base material was recorded on weld data sheets. 4) Exam of weld was performed. 5) Personnel involved were counselled.	1) Fitup was accepted. 2) Final weld was inspected and accepted.



CAQR NUMBER	DATE OCCURRED	DATE REPORTED	DESCRIPTION OF CONDITION	CORRECTIVE ACTION	ASSESSMENT OF HARDWARE
BFP 900001	12/25/89	01/01/90	Welding performed without fitup inspection.	1) Visual inspection was performed. 2) Personnel involved were counselled.	Final visual inspection accepted.
BFP 900056	11/26/89	03/05/90	Measurement not taken prior to removal of temporary pipe supports.	QC reinspected and found deflection within tolerance.	Deflection was determined acceptable.
BFP 900070P	03/07/90	03/13/90	QC holdpoints bypassed during cable pullback.	1) Worked stopped. 2) Condition was documented. 3) Work plan was revised to delete inspection requirements.	Cable was removed to allow replacement with qualified cable.
BFP 900086	03/23/90	03/25/90	1) Conductors were lifted without QC verification. 2) During cable termination it was discovered the termination did not agree with as-constructed drawings.	Drawing discrepancy was issued.	The conduits are not class 1E. Therefore, no QC verification was required.
BFP 900090	03/26/90	03/26/90	Failure to utilize weld area removal data sheet.	1) Personnel involved were counselled and trained. 2) Weld area removal data sheet was issued. 3) Weld was reworked.	Final inspection accepted.
BFP 900159P	05/13/90	05/18/90	QC was not notified prior to removal of primary system valves.	Opening was covered with suitable material.	QC inspected opening; no foreign material was identified.

CAQR NUMBER	DATE OCCURRED	DATE REPORTED	DESCRIPTION OF CONDITION	CORRECTIVE ACTION	ASSESSMENT OF HARDWARE
BFP 900160P	05/19/90	05/19/90	No QC fit-up prior to welding.	1) Weld filler material control program was reviewed. 2) Welder qualification program was reviewed. 3) Fitup inspection on repair weld joint was rejected. 4) Weld joint was repaired and passed final QC inspection.	Weld joint was determined acceptable.
BFP 900198P	06/14/90	06/14/90	Fit-up weld holdpoints were bypassed without notifying QC.	1) Pre-weld inspection was performed by responsible foreman and verified by welding engineering. 2) Welder ID and filler material recorded on weld data sheets. 3) Weld joint was inspected by QC and accepted.	Dispositioned acceptable.
BFP 900234P	07/12/90	07/12/90	Three examples of all bypassed QC fitup holdpoints on three different welds.	1) Visual inspection was performed, one weld repaired and accepted, two welds accepted as is. 2) Base material was verified correct. 3) Training material reviewed.	All three bypassed QC holdpoint examples were dispositioned acceptable.



CAQR NUMBER	DATE OCCURRED	DATE REPORTED	DESCRIPTION OF CONDITION	CORRECTIVE ACTION	ASSESSMENT OF HARDWARE
BFP 900285P	08/22/90	08/23/90	Appendix R fire seal penetrations were breached and repaired without QC involvement.	1) Independent verification of seal installation was used instead of QC inspection.	Seal was accepted as is.
BFP 900288P	08/25/90	08/25/90	QC inspection was not performed during cable pull.	1) Cable was pulled back and inspected for damage. 2) QC inspected reinstallation. 3) Personnel involved were counselled.	Cable pull was accepted by QC.
BFP 900290P.	08/27/90	08/27/90	Holdpoints bypassed during wire (jumper) installation.	1) Wire was relanded. 2) Personnel involved were counselled.	QC accepted wire reland.
BFP 900296P	08/22/90	08/29/90	Cable pulled back (removed from conduit) without documentation.	1) Workplan was revised to document and allow deletion and abandoning of spare cable. 2) Personnel involved were counselled.	Cable abandoned.
BFP 900299P	08/26/90	09/01/90	Piping painted - QC holdpoint bypassed.	1) Revise workplan to delete QC holdpoint. 2) Personnel involved were counselled.	Accepted as is.
BFP 900364	10/31/90	11/01/90	QC holdpoint bypassed during breaching of Appendix R penetration.	Open	Open
BFP 900368	11/03/90	11/03/90	Bypass QC inspection during welding activity.	Open	Open



ENCLOSURE 3

LIST OF COMMITMENTS

NRC INSPECTION REPORT NOS. 50-259/90-27,
50-260/90-27, and 50-296/90-27
LETTER FROM B. A. WILSON TO O. D. KINGSLEY, JR.
DATED OCTOBER 24, 1990

1. Corrective actions necessary to close Condition Adverse to Quality Report (CAQR) BFP 900364 will be implemented. This will be completed prior to Unit 2 startup.
2. Corrective actions necessary to close CAQR BFP 900368 will be implemented. This will be completed prior to Unit 2 startup.

