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SUBJECT: Responds to NRC 910611 ltr re violations noted in insp rept
 50-259/91-17, 50-260/91-17 & 50-296/91-17. Corrective actions:
 Revised methodology for implementing four separation
 clearances.

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Mark O. Medford
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JUL 10 1991

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

Gentlemen:

In the Matter of)	Docket Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - NRC INSPECTION REPORT 50-259, 260, 296/91-17 - REPLY TO NOTICE OF VIOLATION (NOV)

This letter provides TVA's reply to the NOV transmitted by letter from B. A. Wilson to Dan A. Nauman, dated June 11, 1991. NRC cited TVA with a violation for failure to follow procedures.

TVA does not contest this violation. The enclosure to this letter is TVA's "Reply to the Notice of Violation" in accordance with 10 CFR 2.201.

If you have any questions regarding this response, please telephone Patrick P. Carier at (205) 729-3566.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark O. Medford

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission

JUL 10 1991

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Enclosure

Tennessee Valley Authority
Browns Ferry Nuclear Plant
Reply to Notice of Violation

Inspection Report Number
50-259, 260, 296/91-17

INTRODUCTION

The NOV cites TVA with a failure to document the establishment (development) and independent verification of a hold order (equipment clearance) boundary prior to hanging the equipment clearance tags. In addition, the NOV states that tags were being hung as the clearance boundary was developed without releasing the clearance.

TVA does not contest this violation. Special circumstances, such as the number of tags required to establish the clearance boundaries (over four thousand), made these clearances different from clearances prepared on a daily basis to support specific tasks. As a result, TVA developed a specialized methodology to issue these clearances on a system-by-system basis. TVA considered that this methodology was consistent with the equipment clearance procedure and provided more than the normal controls used to protect plant personnel and equipment.

However, the fact that the final signatures, signifying that the entire boundary was reviewed, were not obtained prior to tagging equipment was not fully evaluated. As such, this omission can be considered an administrative oversight.

In accordance with the Commission's Rules of Practice and Procedure, as described in the NRC Staff's June 11, 1991 letter transmitting the subject NOV, TVA hereby replies to the NOV in accordance with the requirements of 10 CFR 2.201.

VIOLATION

"During the NRC inspection conducted on April 29 - May 10, 1991, a violation of NRC requirements was identified. The violation involved failure to comply with the hold order procedure. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' 10 CFR Part 2, Appendix C (1991), the violation is listed below:



Technical Specification, Section 6.8.1, Procedures, requires that written procedures be established, implemented and maintained covering those 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.

SDSP-14.9, Equipment Clearances, Section 6.3, establishes the requirements for establishing a clearance. The clearance boundary must be established and independent verification established and documented on form SDSP-216, Clearance Sheet, prior to hanging the hold order tags.

Contrary to the above, the inspector identified on April 30, 1991, that four separation hold orders 3-91-95, 3-91-96, 1-91-66, and 1-91-67 containing over 3,000 hold order tags were being placed on equipment in the plant without completion of hold order form SDSP-216 for signatures of the hold order boundary establishment and independent verification. Tags were being added and hung as the separation boundaries were developed without releasing of the hold order.

This is a Severity Level IV Violation (Supplement I) applicable to all three units."

TVA'S REPLY

1. Admission of Violation

TVA does not contest this violation.

2. Reason for the Violation

This condition occurred when components were tagged under an equipment clearance before the preparer and independent verifier of the clearance boundary had signed page 1 of Form SDSP-216, Clearance Sheet.

TVA's procedure for issuing equipment clearances at BFN, Site Director Standard Practice (SDSP) 14.9, Equipment Clearance Procedure, requires that a clearance boundary be developed and independently verified before equipment is manipulated and clearance tags hung. Furthermore, the procedure requires the clearance preparer and independent verifier to acknowledge their concurrence with the clearance boundary by signing page 1 of Form SDSP-216. Specific components which comprise the clearance boundary should be identified and documented on page 2 of the form.

At the time equipment clearances cited in the NOV were being developed BFN Unit 2 was in the early stages of its power ascension program after a six-year outage, and Units 1 and 3 were shutdown and planning for recovery activities. To control work activities on these shutdown units without adverse effects on the operating unit, TVA developed the Unit Separation Program. Part of this program involves the mechanical and electrical alignment of systems in Unit 1 and Unit 3 spaces required to support Unit 2 operation.

To accomplish the objective of aligning and isolating Unit 2 supporting systems from Units 1 and 3, TVA developed four equipment clearances: a Unit 1 electrical clearance, a Unit 1 mechanical clearance, a Unit 3 electrical clearance, and a Unit 3 mechanical clearance. TVA determined that grouping components into these four categories was the most effective method since it would maximize administrative control of these separation clearances and minimize the number of clearances issued. In addition, Operations personnel could easily identify that these clearances are separation clearances.

At BFN, clearances normally involve several components and average less than ten tags to establish the boundary. These normal clearances are prepared by reviewing drawings and developing a clearance boundary, independently verifying this boundary, then manipulating and tagging components. Prior to manipulating and tagging components the clearance preparer and independent verifier sign page 1 of Form SDSP-216. Once these activities are completed the clearance is issued.

However, the equipment clearances cited in the NOV were unique clearances in that over one thousand components were isolated and over four thousand tags were hung. Because of this uniqueness, TVA developed these clearances using a different methodology. Specifically, TVA determined that the clearance boundary should be developed and verified as a series of sub-boundaries (on a system-by-system basis). To maintain consistency, only one individual was assigned to prepare the sub-boundaries and another individual to independently verify the sub-boundaries. Following development, a sub-boundary would be independently verified and the independent verifier would initial page 2 of Form SDSP-216 in lieu of signing page 1 of the form. Since the entire clearance boundary would not be complete at this stage, TVA considered that neither the clearance preparer nor the independent verifier should sign page 1 of the form. Finally, after the sub-boundaries were established and verified, page 1 could be signed and the clearance issued.

Prior to developing these four clearances, Operations personnel reviewed system drawings and identified the separation boundaries on the drawings. These "marked-up" drawings were then independently reviewed by a licensed Senior Reactor Operator (SRO). Following the SRO's review and approval, the drawings were reviewed and approved by BFN's Nuclear Engineering organization and the plant System Engineering group.

Using the reviewed and approved marked-up drawings for a system, Operations personnel developed a sub-boundary. This sub-boundary was documented on page 2 of Form SDSP-216 and independently verified. The independent verifier then initialed page 2 to document verification of this portion of the clearance. Once these activities were completed, on-shift Operations management was notified and affected components within the sub-boundary were manipulated and tagged as directed by the clearance.



Since establishment and independent verification of each portion of the clearance were performed and documented prior to manipulating and tagging components, TVA considered that this methodology for developing clearances was consistent with the equipment clearance procedure and provided more than the normal controls used to protect plant personnel and equipment. However, the fact that the final signatures, signifying that the entire boundary was reviewed, were not obtained prior to tagging equipment was not fully evaluated. As such, this omission can be considered an administrative oversight.

3. Corrective Steps Taken and Results Achieved

TVA revised its methodology for implementing the four separation clearances. Whereas TVA was originally only initialing page 2 of Form SDSP-216 after a sub-boundary was developed and verified, Operations personnel signed page 1 after developing and verifying sub-boundaries. Using this revised methodology the four clearances were completed and issued.

As previously discussed, these clearances were unique and the methodology used to develop them was not the methodology used for generating "normal" clearances. Based on these factors, and the fact that the clearances have been issued, TVA considers that no further corrective steps are necessary.

4. Corrective Steps Which Will Be Taken

No further corrective steps are required.

5. Date When Full Compliance Will Be Achieved

TVA has achieved full compliance.