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SUBJECT: Suppls response to notice of violation from Insp Repts      S  
           50-259/93-25, 50-260/93-25 & 50-296/93-25, in response to NRC  
           930907 RAI. Commitments for RPS & PCIS encl.      /

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Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609

October 6, 1993

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Gentleman:

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, 50-260, 296/93-25 - SUPPLEMENT REPLY TO NOTICE OF  
VIOLATION (NOV)**

NRC letter dated September 7, 1993, from R. V. Crlenjak (NRC) to Dr. Mark O. Medford (TVA), requested additional information concerning TVA's response to the subject violation. Specifically, TVA was requested to: 1) indicate why the additional actions identified in TVA's internal investigation of the event were not discussed in the response to the NRC; 2) justify why these corrective actions were not considered necessary to fully address the violation; and, 3) why the corrective actions should not be completed in a more timely manner.

With regard to Item 1, the assessment conducted of the incident investigation (II) results identified the development of a standard methodology to insert trips in the Reactor Protection System (RPS) as an enhancement and not a necessary action to preclude recurrence of the event. It was felt that due to the unique configuration of the turbine stop valve and the main steam isolation valve (MSIV) the actions taken, as described in TVA's response, would be effective in preventing recurrence. In TVA's judgement, the existing practice of relying on the shift personnel's ability to evaluate drawings to detect what actions were necessary to comply with technical specification action statements was adequate. However, TVA considered that this practice alone placed an unnecessary burden on the crew that could be alleviated by the development of a standard methodology.

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In response to Item 2, TVA offers no justification for omitting the corrective action from the original response. In retrospect, TVA considers that, due to both the significance of the planned actions and the impact that the change in operating philosophy will have, the actions should have been discussed in the response.

In response to Item 3, the due date for the completion of the development of the standard methodology was established based upon the scope of the undertaking and the need for training prior to implementation. In addition, the actual scope of the development of the methodology is greater than implied in your letter. The approach currently being taken is not only to address the RPS but also to include the Primary Containment Isolation System (PCIS). The completion dates for the development of this methodology is predicated on three reasons. First, the approach of providing procedural guidance for inserting trips deviated considerable from the current practice of relying on the knowledge of the operators and their ability to research drawings/prints in an expeditious manner. Due to the potential significance of errors that could occur in the implementation of this new methodology, TVA considered that a gradual implementation of the program coupled with specific training was appropriate. Second, as noted in our response to Item 1, TVA believes that the existing practice of relying on the ability of operators to review drawings is an adequate method to determine necessary actions to comply with TS actions statements. Third, TVA has heightened operators' awareness of the unique configuration of the turbine stop valves and MSIVs through required reading, training, and revising the affected divisional functional surveillance instructions.

TVA is currently ahead of the schedule for completion of the development of the standard methodology for the RPS and the PCIS. The development of the methodology for taking compensatory measures in the event of implementation of TS action statements, as well as the necessary training, will be completed by December 15, 1993, for the RPS, and May 1, 1993, for the PCIS.

Finally, NRC also expressed a concern that the NOV response did not address the failure mode of the turbine stop valve limit switch. TVA did not include this information in the response because it considered that it had already met its reporting obligations for this type of hardware malfunction. In LER 260/93008, which had been submitted in July 15, 1993, TVA had reported that "the limit switch for the #1 turbine stop valve was disassembled. A piece of the switch lever

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return spring was found lodged in the switch that prevented internal movement of the switch." Since the failure of the limit switch had not caused the operators to make the mistake and the information had been previously reported, TVA did not consider it pertinent to address in the NOV response. However, TVA does not object to making the information part of the NOV record.

The enclosure to this letter describes the commitments in this reply.

If you have any questions regarding this reply, please telephone me at (205) 729-2636.

Sincerely,



Pedro Salas  
Manager of Site Licensing

Enclosure

cc (Enclosure):

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**ENCLOSURE**

**Tennessee Valley Authority**

**Browns Ferry Nuclear Plant (BFN)**

**Reply to Letter for Additional Information**

**Inspection Report Number**  
**50-259, 260, 296/93-25**

**COMMITMENTS**

1. The development of the methodology for taking compensatory measures in the event of implementation of TS action statements, as well as the completion of the necessary training, will be completed by December 15, 1993, for the RPS.
2. The development of the methodology for taking compensatory measures in the event of implementation of TS action statements, as well as the necessary training, will be completed by May 1, 1993, for the PCIS.

