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SUBJECT: Provides response to violations noted in Insp Repts
50-259/96-03, 50-260/96-03 & 50-296/96-03. Corrective actions:
appropriate steps of procedure signed.

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

R. D. (Rick) Machon
Vice President, Browns Ferry Nuclear Plant

May 14, 1996

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

10 CFR 2
Appendix C

Dear Sir:

**BROWNS FERRY NUCLEAR PLANT (BFN) - NRC INSPECTION REPORT
50-259, 50-260, 50-296/96-03 - REPLY TO NOTICE OF VIOLATION
(NOV)**

This letter provides our reply to the subject NOV transmitted by letter from Mark S. Lesser, NRC, to Oliver D. Kingsley, TVA, dated April 15, 1996. This NOV involved a failure to follow procedures during maintenance on a core spray valve. TVA admits the violation.

The enclosure provides our response to the NOV. No commitments are made in this letter. If you have any questions regarding this reply, please contact Pedro Salas at (205) 729-2636.

Sincerely,

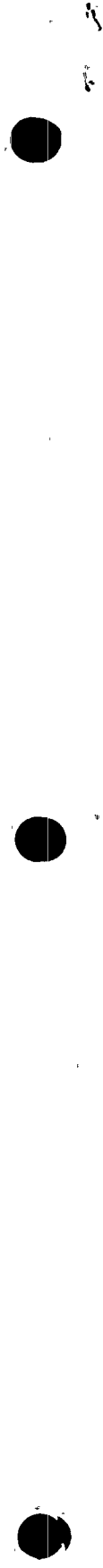


R. D. Machon

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission

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May 14, 1996

Enclosure

cc (Enclosure):

Mr. Mark S. Lesser, Branch Chief
U.S. Nuclear Regulatory Commission
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ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3

INSPECTION REPORT NUMBER 50-259, 50-260, 50-296/96-03
REPLY TO NOTICE OF VIOLATION (NOV)

RESTATEMENT OF THE VIOLATION

"During an NRC inspection conducted on February 4 - March 16, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", NUREG 1600, the violation is listed below:

Technical Specification 6.8.1.1.a requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978. Paragraph 9 of Appendix A of Regulatory Guide 1.33 recommends procedures for performing maintenance.

SSP-2.1, Site Procedures Program, step 3.2.B, states that each step of a "Continuous Use" procedure is to be signed off as complete before proceeding to the next step. ECI-0-000-MOV001, Maintenance For Limitorque Motor Operated Valves, is a "Continuous Use" procedure.

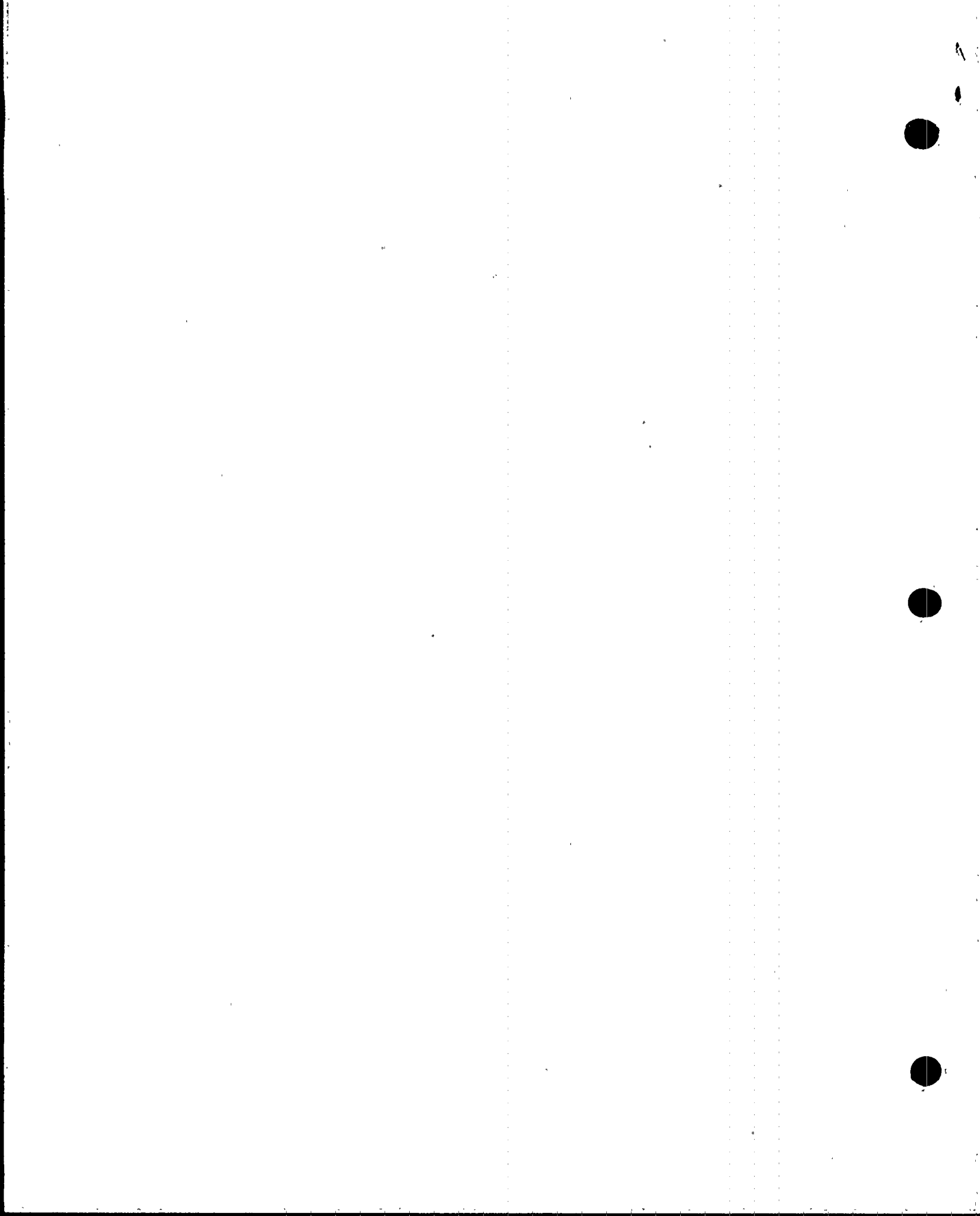
Contrary to the above, on February 29, 1996, written procedures were not implemented during maintenance activities on core spray loop test valve 2-FCV-75-22. Steps of procedure ECI-0-000-MOV001 were not signed off as complete before proceeding to the next step.

This is a Severity Level IV violation (Supplement I)."

TVA'S REPLY TO THE VIOLATION

1. Reason For The Violation

This violation was caused by personnel error. Specifically, individuals responsible for signing the procedure steps failed to sign the steps as required following completion of the individual activities.



2. Corrective Actions Taken And Results Achieved

As an immediate corrective action the appropriate steps of the procedure were signed. Also, appropriate personnel corrective actions were taken with the individuals involved in this event. These individuals then briefed other craftsmen on this event, the importance of following procedures, and the need to appropriately document completion of work activities.

Because the procedure did not meet the criteria for being a "Continuous Use" procedure (the procedure was classified incorrectly), it was revised and redesignated as a "Reference Use" procedure (i.e., no longer requires each step to be signed prior to proceeding to the next step).

In light of this event and previous events that involved Maintenance personnel and procedure adherence,¹ Maintenance management has taken several steps to improve procedure adherence. For example, Maintenance has developed quick-reference cards for Maintenance craftsmen that list, among other things, management expectations for attention to detail and procedure adherence. Maintenance management also continues to stress attention to detail and procedure adherence during their daily debriefs with supervisors and craft personnel. Maintenance management has conducted additional meetings and coaching sessions with Maintenance craft personnel to stress procedure adherence. During some of these sessions, craft personnel involved in the incidents brief their peers on the specific incidents and lessons learned.

3. Corrective Steps That [Have Been Or] Will Be Taken To Avoid Further Violations

Broader steps to increase the accountability for human performance improvements will be coordinated through the BFN Human Performance Quality Council. The council was organized in August 1995 with the responsibility to follow up on recommendations identified by an incident investigation team in July 1994 in response to maintenance related issues. TVA agrees with NRC that "implementation progress appears to have been slowed during the final stages of Unit 3 recovery." In response, the council was reorganized on March 1996. The council will assume overall responsibility for managing site initiatives to improve personnel performance and to be a springboard for new ideas and initiatives to enhance performance and reduce errors,

¹Some of these events are discussed in the inspection report forwarding this NOV.



keeping management focus on human performance issues. Specific corrective actions are being identified and schedules established to resolve outstanding issues identified following the July 1994 investigation.

One item of note being monitored by the council is the simplification of cumbersome maintenance procedures. TVA will charter a team of management and craft personnel to perform a review of high-use maintenance procedures. The purpose of this review will be to identify any problems with the level-of-use classification (e.g., continuous use), use of sign-offs and verifications, duplication of/with work order steps, and user-friendliness. TVA expects to complete this action by late 1996.

TVA is also developing a long-term technical procedure improvement project using a joint effort from TVA's corporate and site maintenance organizations. This program is designed to optimize maintenance and modifications technical procedures by eliminating unused or unnecessary procedures, reducing duplication and complexity, improving the user-friendliness of the procedures, making the procedures self-sufficient through reduction of cascade effects (branching to other procedures), and standardizing procedures for multi-site applications.

The actions discussed above are voluntary improvements initiated by TVA. These actions are not regulatory commitments.

4. Date When Full Compliance Will Be Achieved

TVA is in full compliance.

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