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 Document Control Branch (Document Control Desk)

SUBJECT: Forwards revised response to NRC 970903 ltr re violations noted in insp repts 50-259/97-07, 50-260/97-07 & 50-296/97-07 on 970511-0621. Corrective actions: SSP-12.8 was revised to clarify which clear items allowed on refueling floor.

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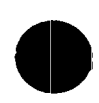
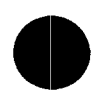
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Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

Christopher M. (Chris) Crane
Vice President, Browns Ferry Nuclear Plant

September 26, 1997

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

10 CFR 2.201

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, 50-296/97-07 - SUPPLEMENTAL REPLY TO NOTICE
OF VIOLATION (NOV)

This supplemental reply is in response to NRC letter, dated September 3, 1997, in which NRC noted that TVA agreed to provide a revised reply to Violation B, Example 3. In the original reply, TVA failed to include a discussion of the cause and corrective actions related to Foreign Material Exclusion (FME) reference sheets for the work order associated with the 1B/D Residual Heat Removal system heat exchanger cleaning.

Consequently, enclosed is TVA's reply to NOV 97-07, including the revision of Violation B, Example 3, providing the additional information. Revised portions of the supplemental reply are identified by revision bars. No commitments are made in this reply. If you have any questions, please contact me at (205) 729-3675.

Sincerely,



C. M. Crane

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission
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September 26, 1997

Enclosure

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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, 50-296/97-07
REPLY TO NOTICE OF VIOLATION (NOV)

RESTATEMENT OF VIOLATION A

"During an NRC inspection conducted on May 11 - June 21, 1997, two violations of NRC requirements were identified. In accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 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. Section 1c of the Regulatory Guide recommends administrative procedures for Equipment Control (e.g., locking and tagging).

General Operating Instruction 0-GOI-300-1, Operations Routine Sheets, Attachment 15.22, EOI (Emergency Operating Instruction) Tools and Equipment Inventory Checklist, dated May 5, 1997, states that ladders are secured with GGMKA padlocks at the designated EOI ladder stations. Attachment 15.22 includes EOI Inventory Form 0-EOI-000-0010 EOI Ladder Stations which describes, in part, a 20 ft Extension Ladder, in place and padlocked at ladder station 3-RB-565-1, Reactor Building Elevation 565'.

Contrary to the above, on May 27, 1997, NRC inspectors identified that 0-GOI-300-1 was not adequately established to ensure EOI ladder station control. A 20 ft extension ladder was not in place and padlocked at ladder station 3-RB-565-1. The ladder that was found at ladder station 3-RB-565-1 was not adequate to support an EOI Appendix action.

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



TVA's REPLY TO VIOLATION A

TVA reviewed BFN Problem Evaluation Report (PER)-970889 and Inspection Report 97-07 to ensure that the description accurately reflects Violation A, corrective actions taken and planned to correct the violation, and preclude recurrence. Therefore, no formal reply to this violation is required.

RESTATEMENT OF VIOLATION B

- B. 10 CFR 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures. Foreign Material Exclusion control, an activity which affects quality by preventing the introduction of foreign materials into systems relied upon to safely operate and shutdown a nuclear plant, is accomplished by implementing the requirements of Site Standard Practice SSP-12.8, Foreign Material Exclusion.

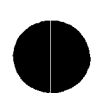
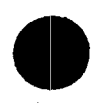
Instruction 1.0.C of Appendix E of SSP-12.8 states that clear material or other material which would be difficult to identify underwater shall not be used on the Refuel Floor, unless specifically authorized by the refueling floor Senior Reactor Operator, Shift Operations Supervisor, or Maintenance Supervisor.

Step 12 of Section 3.5.A of SSP-12.8 requires that a baseline inventory be performed and the log book reconciled prior to activation of a Foreign Material Exclusion Area after it has been inactive for greater than seven days.

Section 3.2 of SSP-12.8 requires Form SSP-62, FME Requirements Reference Sheet, to be filled out by the supervisor of a work activity involving Foreign Material Exclusion controls.

Contrary to the above, during the period of May 28-June 2, 1997, NRC inspectors identified that activities affecting quality were not accomplished in accordance with prescribed procedures in that the requirements of Site Standard Practice SPP-12.8 Foreign Material Exclusion were not properly implemented:

1. Personnel were observed in possession of a roll of clear plastic wrap material on the refueling floor. The material was being utilized on the



refueling floor in support of health physics activities and was not specifically authorized.

2. Baseline inventories and log book reconciliations were not being performed prior to some reactivations of the spent fuel pool FME areas after they had been inactive for greater than seven days.
3. Forms SSP-62, FME Requirements Reference Sheets, associated with Work Orders 97-004237-000 (Removal of paint from refueling floor overhead beams) and 97-003911-000 (1B/1D residual heat removal system heat exchanger cleaning) were not filled out properly. The level of foreign material exclusion protection prescribed in SSP-12.8 was not properly indicated on the forms.

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

TVA's REPLY TO VIOLATION B

Example 1

1. Reason For Example 1

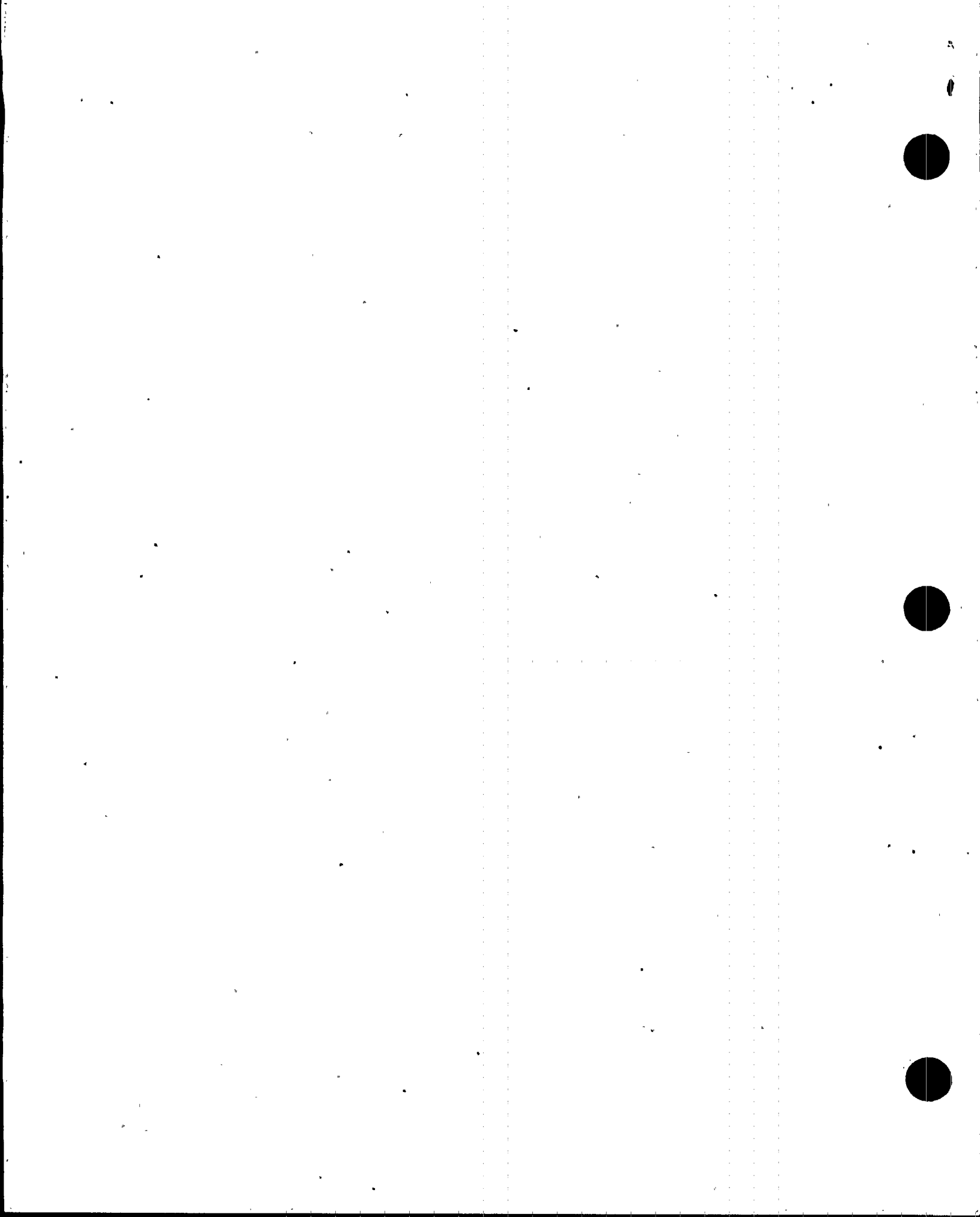
This example resulted from worker's methods and ingrained habits used in the completion of a task. Specifically, clear plastic is used to: (1) wrap collected air sample cartridges/filters from various locations in the plant including the refuel floor before transferring them to the Chemistry Laboratory, and (2) place on personnel contamination monitors to provide protection to the detector below the foot plate.

Since these uses of plastic have been employed at BFN for several years, the involved individuals believed that clear plastic was previously authorized for this specific application to be on the refuel floor. Therefore, no willful violation of procedural requirements occurred.

2. Corrective Steps Taken And Results Achieved

SSP-12.8 was revised to clarify which clear items are allowed on the refueling floor, and which items need special approval/authorization.

Suitable substitute material was obtained to replace the clear wrap used by Radcon personnel on the refueling floor.



3. Corrective Steps That [Have Been Or] Will Be Taken To Prevent Recurrence

TVA held stand-down meetings to communicate to Radcon personnel the importance of compliance with SSP-12.8, and the use/restriction of clear materials on the refuel floor.

4. Date When Full Compliance Will Be Achieved

TVA is in full compliance.

Example 2

1. Reason For Example 2

Root causes of this example were a result of tiered personnel errors: (1) the Foreign Material Exclusion Monitor (FMEM) failed to follow procedure SSP-12.8; (2) the FMEM supervisor failed to detect or correct FMEM documentation errors; and (3) the FMEM supervisor failed to review baseline logs, to ensure logs were properly updated for new material entering the FME area, and to follow procedure.

Although there were several causes to this event, TVA believes that not maintaining the affected FME log was a unique condition for the following reasons: (1) FME areas are always in existence on the refuel floor, (2) responsibility for the FME in these areas was divided between two organizations, and (3) the controlling procedure did not clearly define when a transfer of responsibility should take place between organizations.

2. Corrective Steps Taken And Results Achieved

The identified documentation errors of the long-term refueling floor FME logs were corrected by the performance of new baseline inventories for all three units.

3. Corrective Steps That [Have Been Or] Will Be Taken To Prevent Recurrence

Identified FMEM issues were incorporated into the initial training for FMEMs. Briefings were held with previously trained FMEMs.



Maintenance supervisory issues identified in this example will be discussed with the appropriate maintenance supervisors during their next annual training.¹

Operations supervisory issues identified in this example will be discussed with the appropriate Operations supervisors during FME control training.¹

SSP-12.8 was revised to clearly delineate supervisory responsibility for refueling floor FME control areas.

TVA held stand-down meetings for Operations and Maintenance personnel to communicate the FME events and to discuss corrective actions taken.

4. Date When Full Compliance Will Be Achieved

TVA is in full compliance.

EXAMPLE 3

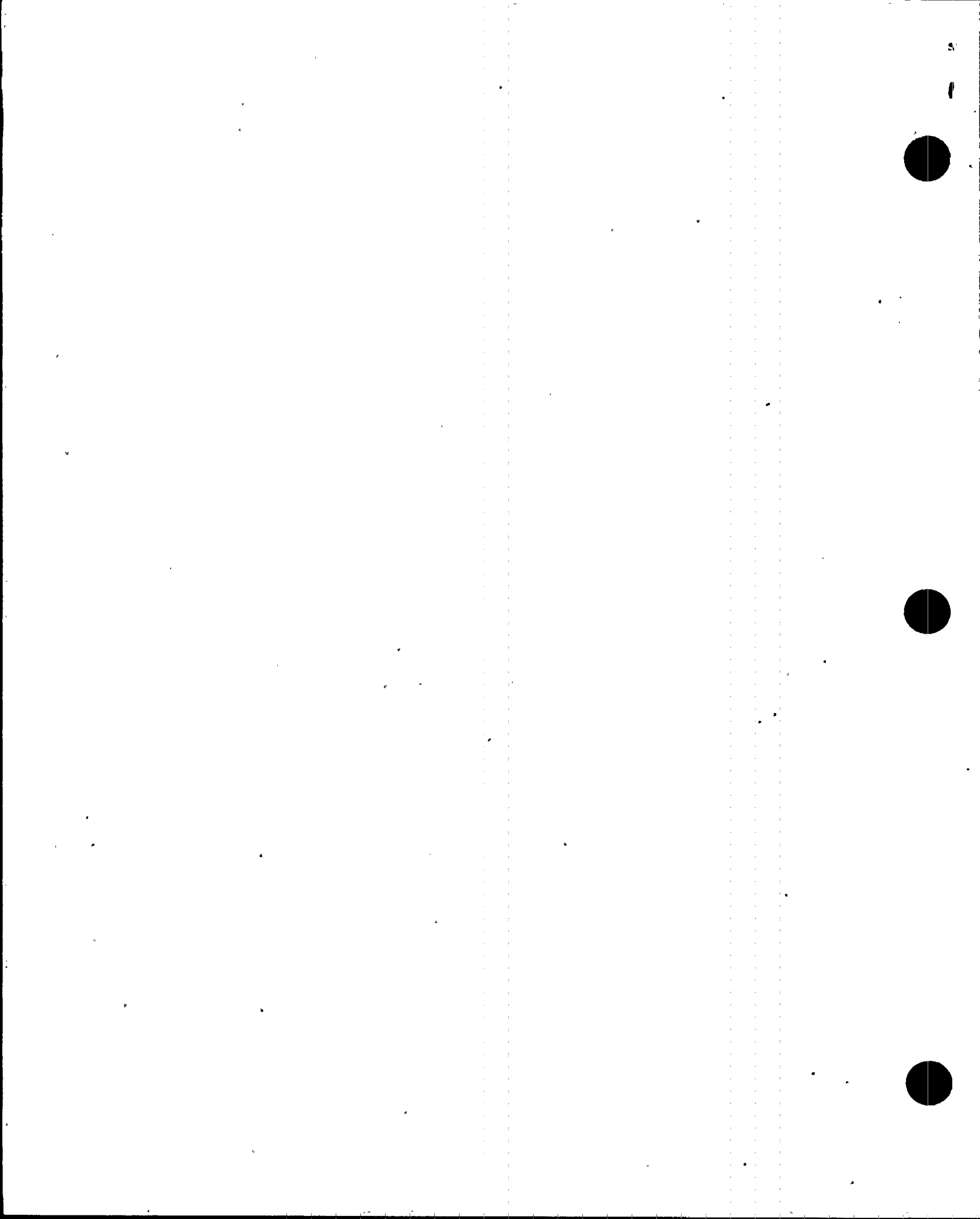
1. Reason For Example 3

The root cause of this example was personnel error for failure to follow procedure.

In the WO for the refueling floor event, a foreman identified that two forms were available to control an FME area (Fuel Pool area). Form SSP-62 is normally used in the plant to assess the FME controls prior to establishing an FME area. Whereas, Form SSP-169 is used in the plant for an established FME area. In this example, the Fuel Pool area was already an established FME area. Therefore, the foreman completed the required Form SSP-169; however, the foreman neglected to complete the redundant SSP-62 form.

In the RHR Heat Exchanger WO event, the foreman indicated FME requirements exceeding procedural guidelines on Form SPP-62. However, he did not conduct a follow-up review of the area to ensure that the additional requirements were in place. Consequently, the additional requirements were not implemented.

¹ This action is being tracked by TVA's Corrective Action Program and is not considered a regulatory commitment.



2. Corrective Steps Taken And Results Achieved

In the Refueling Floor WO event, personnel corrective actions were taken in accordance with TVA policy. SSP-12.8 was revised to delete the need for a redundant Form SSP-62.

In the RHR Heat Exchanger WO event, personnel corrective actions were taken in accordance with TVA policy. SSP-12.8 was revised to delete the need for Form SSP-62.

3. Corrective Steps That [Have Been Or] Will Be Taken To Prevent Recurrence

As a result of the refueling floor and the RHR heat exchanger WO events, TVA held stand-down meetings for Maintenance personnel to communicate the FME events and to discuss corrective actions taken.

As the result of revising SSP-12.8, training of plant personnel will be conducted ¹

4. Date When Full Compliance Will Be Achieved

TVA is in full compliance.

¹ This action is being tracked by TVA's Corrective Action Program and is not considered a regulatory commitment.

