NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry Nuclear Plant

Docket No. 50-260
License No. DPR-52

During an NRC inspection conducted on August 3 - September 13, 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 (TS) 4.6.H.4 which addresses snubber functional testing scheduling, lot size, and composition, states that during each refueling outage, a representative sample of 10 percent of the total of each type of safety-related snubbers in use in the plant shall be functionally tested either in place or in a bench test.

Contrary to the above, snubber functional testing was not being performed during refueling outages. For example, snubber 2-SNUB-063-5001, associated with the Unit 2 standby liquid control system, was removed and functionally tested on September 9, 1997, with Unit 2 operating at power. In previous refueling outages, numerous snubbers were functionally tested before the outage began, consequently the required testing was not completed during the refueling outage. The practice of performing snubber functional testing at other than refueling outage conditions has been utilized at Browns Ferry for at least the last two years.

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

B. Technical Specification (TS) 6.8.1.1a 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 that can affect safety related equipment.

Section 5.1 of Technical Instruction (TI) 0-TI-264, Scaffolds and Temporary Platforms, states that prior to and during erection, Appendix M, Scaffolding/Temporary Platform Erection Checklist, shall be completed and maintained with the scaffold platform log.

Section 2.7.7 of 0-TI-264 states, in part, if the required clearance cannot be physically achieved, Site Engineering evaluation and approval shall be obtained and documented prior to erecting the portion of the scaffold in which the clearance cannot be achieved.

Enclosure 1

Section 2.9.4 of Appendix L of 0-TI-264 requires, in part that after the Site Engineering evaluation has been completed and the scaffold erected, the responsible field engineer shall inspect the scaffold or platform per the Site Engineering evaluation requirements.

General precaution 4.4 and step 7.11.4 of 0-TI-264 require that the areas around scaffolds which can be used for handholds or footholds shall be posted with caution signs and/or tape to avoid use as handholds or footholds.

Contrary to the above, written procedures for performing maintenance which can affect safety related equipment were not properly implemented in that: A scaffold erection checklist was not completed for Scaffold 2322 and checklists for several other scaffolds were not completed properly; several scaffolds near safety systems were erected in which the minimum clearances could physically have been achieved but were not; the responsible field engineer failed to note that Scaffold 2322 did not have the minimum clearances specified in the Site Engineering evaluation (in respect to the suppression chamber outside surface); and numerous potential handholds and footholds located near scaffolds in the Unit 2 reactor building were not posted with caution tags or tape. These conditions were identified on August 26, 1997.

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

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at Browns Ferry, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request

withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g. explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
this 8th day of October 1997