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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

ENRRC REGION II  
ATLANTA, GEORGIA

400 Chestnut Street Tower II

30 SEP 8 AIO: 11

August 29, 1980

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region II - Suite 3100  
101 Marietta Street  
Atlanta, Georgia 30303

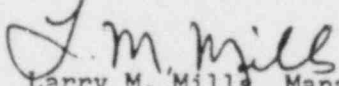
Dear Mr. O'Reilly:

OFFICE OF INSPECTION AND ENFORCEMENT BULLETIN 80-17, SUPPLEMENT  
3 - RII:JPO 50-259, -260, -296 - BROWNS FERRY NUCLEAR PLANT

Your letter dated August 22, 1980, to H. G. Parris transmitted IE  
Bulletin 80-17, Supplement 3 for TVA action. Enclosed is our  
response to the subject bulletin. If you have any questions, please  
call Jim Domer at FTS-857-2014.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



Larry M. Mills, Manager  
Nuclear Regulation and Safety

Subscribed and sworn to before  
me this 29<sup>th</sup> day of Aug 1980.

Bryant M. Lowery  
Notary Public

My Commission Expires 4/4/82

Enclosure

cc: Office of Inspection and Enforcement (Enclosure)  
U.S. Nuclear Regulatory Commission  
Division of Reactor Operations Inspection  
Washington, DC 20555

ENCLOSURE

RESPONSE TO OIE BULLETIN 80-17, SUPPLEMENT 3  
BROWNS FERRY NUCLEAR PLANT  
FAILURE OF CONTROL RODS TO INSERT DURING A SCRAM AT A BWR

ITEM

- 1.a. For those plants in which the scram discharge volume headers are connected to the instrument volume by a 2-inch pipe, within five days of the date of this Bulletin, provide or verify that procedures are in effect to:
  - a. Require an immediate manual scram on low control rod drive air pressure with a minimum 10 psi margin above the opening pressure of the scram outlet valves.

RESPONSE TO ITEM 1.a.

Plant instructions were changed on August 27, 1980, to provide for a manual scram in the event that scram pilot air header pressure drops to 60 psig. This is 10 psig above the opening pressure of 50 psig for the scram outlet valves. The opening pressure is conservative based on information provided by General Electric and tests performed by other utilities.

ITEM

- 1.b. Require an immediate manual scram in the event of:
  - (1) Multiple rod drift in alarms, or
  - (2) A marked change in the number of control rods with high temperature alarms.

RESPONSE TO ITEM 1.b.

Plant instructions were changed on August 27, 1980, to provide for a manual scram should either of these two events occur.

ITEM

2. In addition, every BWR license is required within five days of the date of this Bulletin to provide and implement procedures which require a functional test using water for the instrument volume level alarm, rod block and scram switches after each scram event, before returning to power. This procedure should remain in effect until modifications in addition to Item B.1 of IEB 80-17 supplement No. 1 are completed to substantially increase reliability of water level indication in the scram discharge volume(s).

RESPONSE TO ITEM 2

Plant instructions were changed on August 27, 1980, to provide for this functional test. It should be noted that functional testing of these switches on unit 3 has resulted in a dose of 75 - 150 man-mrem per test. Dose rates for units 1 and 2 will be higher. Based on past operating experience at Browns Ferry unit 3, this results in an increased exposure of at least 3.75 - 7.5 man-rem per year.

MANPOWER REQUIRED FOR CORRECTIVE ACTION/REPORTING

As requested by the subject bulletin, in order to assist the NRC in evaluating the value/impact of each bulletin, the manpower required to review and prepare the report as well as perform the necessary corrective actions are provided below:

- (a) Review/Prepare Response - Approximately 20 man-hours
- (b) Corrective Actions - Approximately 15 man-hours (but does not include man-hours required for functional testing).