400 Chestnut Street Tower II

September 4, 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:

Enclosed is our response to R. C. Lewis' August 15, 1980, letter, RII:RFS 50-259/80-28, -260/80-21, and -296/80-22, concerning activities at Browns Ferry Nuclear Plant which appeared to be in noncompliance with NRC requirements.

We have reviewed the above inspection report and find no proprietary information in it. If you have any questions, please call Jim Domer at FTS 857-2014.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

for L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

ENCLOSURE

RESPONSE TO R. C. LEWIS' LETTER DATED
AUGUST 15, 1980, TO H. G. PARRIS
BROWNS FERRY NUCLEAR PLANT
(RII:RFS 50-259/80-28, -260/80-21, -296/80-22)

Appendix A of the inspection letter identified activities which were apparently in noncompliance with NRC requirements. The following are those items and our response.

Infraction

> As required by 10 CFR 50 Appendix B and implemented by Tennessee Valley Authority Nuclear - Operational Quality Assurance Manual Section 2.1 Part II, upon completion of maintenance on any item of the CSSC list and before release for service, appropriate testing shall be performed to verify operational acceptability.
>
> Contrary to the above, on June 23, 1980, the control valve #2 pressure sensor, which sends a signal to the Reactor Protection System to indicate turbine control valve fast closure, had maintenance performed on it and was returned to service without testing of the Reactor Protection System to verify proper operation of the repaired pressure switch.

Response

Corrective Steps Taken and Results Achieved

The subject pressure switch, located in the Reactor Protection System, is automatically bypassed and not in service below 30-percent power. (Reference: Browns Ferry Technical Specification 3.1-A, Table 3.1.A, "Operability of Turbine Control Valve Loss of Oil Pressure Trip Function at Power Levels $\geq$ 30 percent.") Bypass of this scram function below 30-percent power is provided by a pressure switch that monitors turbine first-stage pressure.

It is our position that the intent of the OQAM and the technical specification was met. Testing of the subject pressure switch is normally performed above 30-percent power by procedure S.I. 4.1.A.12. Testing of the subject reactor protection system pressure switch was accomplished as soon as possible after the 30-percent automatic bypass interlock was cleared.

Corrective Steps Taken to Avoid Further Noncompliance

Events related to the failure of the subject pressure switch (PS-47-144) have been reported under Licensee Event Report 50-259/8050. Additionally, the TVA Division of Nuclear Power Quality Assurance Staff has investigated the incident and prepared a report including recommendations to prevent recurrence. These recommendations are being studied for future corrective action. However, this independent investigation concurred with the position stated regarding the testing of the switch.

Date Full Compliance Achieved

It is TVA's opinion that we were not in noncompliance with 10 CFR Part 50 or the TVA OQAM.