

ENCLOSURE
RESPONSE - NRC INSPECTION REPORT NOS.
50-259/81-28, 50-260/81-28, AND 50-296/81-28
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED OCTOBER 30, 1981

APPENDIX A

Item A - (259/81-28-02)

Technical Specification 3.11.H requires that a continuous fire watch shall be stationed in the immediate vicinity where work involving open flame, welding or burning is in progress.

Contrary to the above, a continuous fire watch in the immediate vicinity of welding operations was not met in that on August 22, 1981, three welding operations were being performed simultaneously with only one fire watch. Because of the locations of the welding operations the single fire watch could observe only one location at a time.

This is a Severity Level IV Violation (Supplement 1.D.3.) and is applicable to Unit 1.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The general foreman requested the laborer foreman to assign two fire watches to the area. However, the laborer foreman failed to do as instructed. The fire watch later told his foreman that one man could not cover this work. The laborer foreman failed to act, and the men performing the work failed to ensure it was adequately covered by a fire watch.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Disciplinary action was taken against the laborer foreman for his failure to respond to the request of the general foreman and laborer. The laborer was also disciplined for not staying at his station to ensure that no potential for fire existed 30 minutes after the end of welding. The boilermakers actually performing work in the area without a fire watch were disciplined, and every man in each of those two boilermaker crews was instructed on fire watch requirements.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Training for all field services welders and foremen will be conducted on the requirements of DPM N78S2, "Safety and Hazard Control Manual." The requirements will be outlined in the field services safety awareness bulletin for discussion at all the craftsmen's safety meetings.

Modification and Addition Instruction (MAI) 21 will be modified to include a continuous fire watch requirement for work in adjoining bays under the torus on elevation 519.

5. Date When Full Compliance Will Be Achieved

Training classes were held for the boilermakers involved on August 22, 1981. A safety and awareness bulletin will be published and training completed by December 4, 1981. MAI-21 was modified and became effective November 10, 1981.

Item B - (259/81-28-09, 260-81-28-06, 296-81-28-06)

10 CFR 50, Appendix B, Criterion XVI, as implemented by TVA Topical Report, TVA-75-1, paragraph 17.1A.16 requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, conditions adverse to quality were not promptly identified and corrected in that frequent air vacuum valve seal and float damage, plugged vents and a missing valve part for the residual heat removal service water system at the pump rooms had been occurring for an extended period of time without adequate identification of adverse conditions and without taking appropriate prompt corrective action.

This is a Severity Level IV Violation (Supplement I.D.3.)

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

TVA was aware of maintenance problems on pump air vent valves on the residual heat removal service water (RHRSW) system. However, because of the design of the valve and type of service, it was expected that valves would require periodic repairs. Failures were intermittent and no overall corrective program was determined to be necessary at that time.

3. Corrective Steps Which Have Been Taken and the Results Achieved

The broken, upper float guide (missing valve part) was analyzed by the TVA Metallurgical Group for metal defects and none were found. An engineering evaluation of vent valve failures has been performed. As a result of this, a scheduled maintenance kick-out has been initiated to inspect air vacuum valve internals every operating cycle.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

The RHRSW air vacuum valves' operation will be visually examined more thoroughly during the performance of Mechanical Maintenance Instruction (MMI) 29 in the future to determine if seal and float damage have occurred during operation. This is in addition to the periodic disassembly and inspection mentioned above.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 30, 1981, when revisions to MMI-29 which specifically calls for inspection of air vacuum valves will be approved.

Item C

Technical Specification 6.3.A requires that detailed written procedures shall be prepared, approved, and adhered to.

(259/81-28-05)

1. Contrary to the above, the requirement that fire prevention procedures be adhered to was not met in that on September 10, 1981, the Safety and Hazard Control Manual procedure F-22, Torch Cutting, Welding, Open-Flame, Grinding, and Spark-Producing Work Requirements and Precautions (DPM N78S2) as implemented by Standard Practice 14.1 was not completed for welding permit number 1748.

This is a Severity Level V Violation (Supplement I.E.) and applicable to Unit 1.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The foreman inadvertently failed to complete the welding and burning permit certification section before signing and obtaining approval signatures.

3. Corrective Steps Which Have Been Taken and the Results Achieved

The foreman was given a verbal reprimand for failure to follow procedures and for lack of attention to detail.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

At a weekly foreman's meeting, field services foremen will be made aware of the requirements for strict adherence to procedures and the consequences of violating procedures.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 18, 1981.

(259/81-28-08, 260/81-28-05, 296/81-28-05)

2. Contrary to the above, the requirement that detailed written procedures be adhered to related to test procedures was not met in that the annual requirement for residual heat removal service water (RHRSW) pump operability test, the RHRSW compartment leak rate test, and the RHRSW sump pump capacity test was not met for 1978 and 1980. Additionally, in 1979, the RHRSW compartment leak rate test for the "C" and "D" compartments was invalid and not retested to satisfy the annual requirement. The annual requirement is established by Mechanical Maintenance Instruction 19.

This is a Severity Level V Violation (Supplement I.E.).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Documentation of the performance of RHRSW compartment leak rate tests for 1978 and 1980 cannot be found, and therefore it is assumed the test was not performed. The reasons for the missing data cannot be ascertained. The reason for failure to retest C and D compartment leakage rates cannot be determined. Lack of a comprehensive scheduled maintenance tracking system was probably the largest contributing factor.

3. Corrective Steps Which Have Been Taken and the Results Achieved

MMI-19 was performed September 28, 1981, and the equipment performed satisfactorily.

4. Corrective Steps Which Will Be Taken To Avoid Further Violation

A more concerted effort will be made to accomplish scheduled maintenance instructions. The established scheduled maintenance tracking system will be reviewed to ensure punctual performance.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 28, 1981, when MMI-19 was performed.

Item D - (259/81-28-04)

Technical Specification 6.3.D.1 requires that each high radiation area in which the intensity of radiation is greater than 100 mrem/hr that the entrance shall be controlled by the issuance of a special work permit and that positive control over work activities shall be maintained by the use of a dose rate monitoring device.

Contrary to the above, the requirement that a special work permit be issued and a dose rate device be used for a high radiation area were not met in that on September 8, 1981, two TVA employees entered a high radiation area without the issuance of a special work permit or a dose rate monitoring device.

This is a Severity Level V Violation (Supplement I.E.) and applicable to Unit 1.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The workers involved in the violation were trying to determine the proper placement of a scaffold in order to allow spraying cable trays in the ceiling on elevation 565 in the reactor building. In doing so, they thought they had obtained proper clearance from the health physics technician at the control point to use a telescoping scaffold located on the east side of the east scram discharge header. The workers incorrectly assumed the special work permit they signed in on would cover this work. They also assumed that work meant staying in the area to build the scaffold; therefore, they ignored the requirement for a high dose rate instrument.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Both workers were given a letter of warning for violating health physics (HP) procedures and participated in a reorientation session by HP.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

A training session was held for the field services' carpenters on HP requirements, especially in the area of the scram discharge headers. This training covered exposure control, use of the special work permit, and conditions peculiar to the scram discharge headers.

5. Date When Full Compliance Will Be Achieved

Four training sessions have been held--two sessions on September 14, 1981, one on September 15, 1981, and one on September 22, 1981. We are now in full compliance.

Item E - (259/81-28-06, 260/81-28-03, 296-81-28-03)

10 CFR 50, Appendix B Criterion XIII requires that measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment. TVA Topical Report, TVA-TR75-1 commits to Regulatory Guide 1.38, Revision 2 of May, 1977 which endorses ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plant," which requires that the use or storage of food and drinks in any storage area shall not be permitted.

Contrary to the above, the requirement that food and drinks not be stored in any storage area was not met in that.

1. On September 17, 1981, food and drink was observed to be stored in the Power Stores explosive proof refrigerator used for storage of Class "C" explosives.
2. On September 18, 1981, a water cooler and a isotonic electrolyte drink additive was observed in warehouse 3 storage area and not in a designated area as required by Standard Practice BF 16.4.

This is a Severity Level VI Violation (Supplement II.F.).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

- a. Existing administrative procedures were violated by personnel who were aware of the requirements.
- b. This portion of the violation occurred because warehouse 3 had not been properly divided and posted regarding food and drink. The water cooler and isotonic electrolyte drink additive were in an area which had always been used for a food and drink area. However, signs designating this area had not been properly posted.

3. Corrective Steps Which Have Been Taken and the Results Achieved

- a. Food and drink were immediately removed from the refrigerator.
- b. The area where the cooler and drink additive were observed has been properly posted as a food and drink area.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

- a. All power stores personnel were reminded of the requirements regarding storage of food and drink as outlined in Standard Practice BF 16.4 on September 21, 1981.
- b. As noted above, the area has been properly posted.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 24, 1981, when the area in warehouse 3 was properly posted (trouble report No. 200206).