

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1 2, and 3

Docket Nos. 50-259, 260, & 296
License Nos. DPR-33, 52, & 68

As a result of the inspection conducted on April 26 - May 25, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. 10 CFR 50.59 requires that the licensee maintain records of changes in the facility and that records shall include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, the requirement that a written safety evaluation be made was not met in that the off-gas post-treatment sampling station configuration was modified by the addition of a temporarily installed sample pump without a safety evaluation being performed. The off-gas sampling station is described in figure 7.12-2a of the Final Safety Analysis Report.

This is a Severity Level IV Violation (Supplement I.D.1) and pertains to all three units.

- B. Technical Specification 4.8.B.1.a requires that for effluent streams having continuous monitoring capability, the activity and flow rate shall be monitored and recorded to enable release rates of gross radioactivity to be determined on an hourly basis.

Contrary to the above, the requirement that effluent streams having continuous monitoring capability have the activity monitored on an hourly basis was not met in that the inspectors determined that the sampling line for the turbine building exhaust ventilation going to Continuous Air Monitor (CAM) had accumulated water (approximately two cups) obstructing the sample flow. The sample line had been blocked by water accumulation for an undetermined amount of time. The licensee had previously identified that this line has a tendency to accumulate water and had replaced the sample pipe with clear plastic hose to aid in determining water accumulation; however, no specified frequency was established to determine moisture build up.

This is a Severity Level V Violation (Supplement IV.E.) and is applicable to Unit 2.

- C. Technical Specification 6.3 requires that detailed written procedures shall be adhered to, reviewed by the Plant Operating Review Committee (PORC) and approved by the Plant Superintendent.

Contrary to the above, the requirement that procedures be adhered to, reviewed by PORC and approved by the Plant Superintendent was not met in that:

1. The procedure used to perform the weekly off-gas post treatment analysis, required by Technical Specification (TS) 4.8.B.3, Radiochemical Laboratory Manual (RLM) procedure 709B, was not of the current revision.
2. The procedure used to perform the weekly sensor check of waste gas monitors, required by TS 4.8.B.4, RLM procedure 741, was not reviewed by PORC or approved by the Plant Superintendent.
3. The procedure being used for inspection of new fuel, General Operating Instruction (GOI) 100-2, was not of the current revision, in that the data sheet being used to sign off inspection points had been superseded by a later revision.

This is a Severity Level V Violation (Supplement I.E.) and is applicable to all three units.

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: JUN 03 1982