

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

2-11-82 11:42
August 4, 1982

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

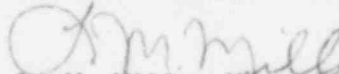
Dear Mr. O'Reilly:

In response to discussions with your staff, we are enclosing a revised response to Browns Ferry Inspection Report 50-259/82-11, -260/82-11, and -296/82-11. Our initial response was transmitted to you by D. S. Kammer's letter dated July 16, 1982. If you have any questions, please call Jim Domer at FTS 858-2725.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


L. M. Mills, Manager
Nuclear Licensing

Enclosure

ENCLOSURE

SUPPLEMENTAL RESPONSE - NRC INSPECTION REPORT NOS.
50-259/82-11, 50-260/82-11, AND 50-296/82-11
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED JUNE 16, 1982

APPENDIX A - (259/82-11-01)

10 CFR 50, Appendix B, Criterion V, as implemented by TVA Topical Report TR-75-1, paragraph 17.2.5, requires activities affecting quality to be prescribed by documented instructions, procedures or drawings of the type appropriate to the circumstances.

Contrary to the above, Drawing No. 47W406-1, a documented drawing prescribed for installation of the local leak rate test line on the unit 1 Reactor Water Cleanup system, was inappropriate to operational circumstances in that it did not specify support for a two-foot horizontal segment of the test line on which there were mounted two 13 lb. valves. On March 20, 1982, the vent line fractured due to detrimental loading that occurred because of the lack of support.

This is a Severity Level V Violation (Supplement 1).

Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The test line and its associated manual isolation valves were inadequately supported which led to high-frequency fatigue and subsequent cracking of the line. During the inspection to locate the leak, it was noted that the vent connection had previously been provided with a vibration support. Support requirements for this vent connection were not shown on TVA drawings. The support had apparently been removed at some time for maintenance or modification work. Reinstallation had not been performed because vibration support requirements were not shown on design drawings.

3. Corrective Steps Which Have Been Taken and Results Achieved

The broken test line was repaired using a properly-approved and -administered design change request and engineering change notice.

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

An evaluation of any suspect units 1 and 2 safety-related piping systems will be conducted to verify that similar problems do not exist on other test, vent, or drain connections. If any discrepancies

are found, appropriate corrective action will be taken. This inspection will be performed during the unit 1 cycle 5 and unit 2 cycle 4 refueling outages presently scheduled for completion July 17, 1983, and January 30, 1983, respectively. We will provide you with results of this evaluation by January 17, 1984. If any needed modifications are identified as a result of this evaluation, we will provide you with a schedule of implementation in this supplemental response.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 26, 1982 when work on unit 1 was completed and drawings revised.