

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

REGIONAL OFFICE
400 Chestnut Street Tower II

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July 16, 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:

Enclosed is our response to R. C. Lewis' June 16, 1982 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/82-11, -260/82-11, -296/82-11 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our response to Appendix A, Notice of Violation. 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

D S Kammer

D. S. Kammer
Nuclear Engineer

Enclosure

ENCLOSURE

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 a support.

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

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

Repairs were performed using a properly-approved and -administered design change request and engineering change notice.

An additional design change request has been initiated to provide detailed drawings and notes on mechanical vibration supports and vent, drain, and test connections for portions of main steam, reactor feedwater, reactor water cleanup, residual heat removal, high-pressure coolant injection, reactor core isolation cooling, core spray, reactor drains, vents, and miscellaneous piping systems for units 1 and 2 similar to those provided for unit 3.

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

When drawings are issued, they will be used in the performance of any future similar work.

5. Date When Full Compliance Will Be Achieved

The design change request will be factored into the overall integrated commitment schedule for implementation.