

TENNESSEE VALLEY AUTHORITY

NRC REGION II  
CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

NOV 16 3 10

November 10, 1982

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

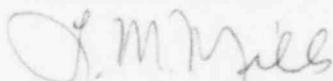
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' October 7, 1982 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/82-34, -260/82-34, -296/82-34 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, and to Appendix B, Notice of Deviation. A two-day extension was discussed with F. Cantrell of your staff on November 9, 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

RESPONSE - NRC INSPECTION REPORT NOS.  
50-259/82-34, 50-260/82-34, AND 50-296/82-34  
R. C. LEWIS' LETTER TO H. G. PARRIS  
DATED OCTOBER 7, 1982

Appendix A

Item A - (259/82-34-02)

Technical Specification 6.7.a requires that events listed shall be reported as expeditiously as possible, but within 24 hours to the appropriate Regional office.

Contrary to the above, the requirement was not met in that on September 9, 1982, HPCI condensate header low level switches LS 73-56A and B were found inoperative during the performance of Surveillance Instruction 4.2.B.26. The report to Region II was given on September 14, 1982, with a date of September 13, 1982, listed as the date of occurrence.

This is a Severity Level IV Violation (Supplement I.) 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 event was not determined reportable until September 13, 1982. This date, rather than the event date, was inadvertently listed on the licensee event report (LER). The event was reported as required. The administrative error regarding the date of the event had no bearing on the evaluation of the event and in our view has a minor safety significance. We feel the violation should be appropriately classified as a Level V violation.

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

The LER has been revised to reflect the events as they occurred.

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

A review of past reporting practices has not revealed any problem with the event evaluating and reporting program.

5. Date When Full Compliance Will Be Achieved

Not applicable.

Item B - (259, 260, 296/82-34-05)

Technical Specification 6.3.A requires detailed written procedures shall be prepared, approved, and adhered to for testing requirements. Mechanical Maintenance Instruction (MMI) 27 requires an up to date and accurate inventory of all Critical Structure System and Component (CSSC) tools be maintained by the tool room attendant.

Contrary to the above, the requirement was not met in that during an inspection to verify the control of measuring equipment used on critical systems, the following discrepancies were noted:

1. MMI 27 requires annual calibration of the Standard Measuring Rods (1" to 24") - No record exists to indicate these rods are periodically calibrated. No traceability records were available for the inspector to review.
  2. The set of Brown-Sharp Jo blocks was incomplete with several blocks missing. No documentation was available to indicate whether the missing blocks were necessary for CSSC use.
  3. On Attachment B of MMI 27 (Required Inventory of CSSC Tools), two tools are listed as required, but no record was available to indicate to the inspector where these tools were located. The tool room attendant said he did not remember ever seeing these tools. The tools include a 10,000 pound, Model X, Dillion force gage and a Universal Level Protractor (7"to 12").
  4. The required inventory tool list in MMI 27 has numerous errors on the quantity of tools available for CSSC use. Examples include:
    - a. Inventory shows 27 torque wrenches onsite; actually 41 are onsite.
    - b. Dial indicator quantity; greater number available than indicated on inventory list.
    - c. GEN-A-TAK tachometers, two on inventory list; actually three available.
- The above list is only an example since almost every quantity category was in error.
5. Some tools were available for maintenance use but not listed on the attachment B tool list. Examples include:
    - a. Feeler gages not listed but used for CSSC use.
    - b. Torque screwdrivers not listed but used for CSSC use.

This is a Severity Level V Violation (Supplement I.) and is applicable to Units 1, 2, and 3.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Maintenance personnel were not familiar with the details of the controlling procedure, MMI 27.

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

The toolroom attendant has been instructed in the requirements of the controlling procedure.

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

MMI 27 is being reviewed and will be revised to remove unnecessary requirements and tools not required for CSSC work.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 15, 1982 when the MMI revision will be completed.

Item C - (259, 260, 296/82-34-06)

10 CFR 50, Appendix B Criterion XII, as implemented by TVA Topical Report TR 75-1, paragraph 17.2.12, requires that measures shall be established to assure that instruments used in activities affecting quality are properly controlled and calibrated at specified periods to maintain accuracy within necessary limits.

Contrary to the above, the requirement was not met in that temperature instrumentation (thermometers) used to determine compliance with plant technical specification limiting conditions for operation was not calibrated or certified to nationally recognized standards.

Examples of where this type of temperature instrumentation is used include:

1. Local temperature instrumentation on the standby liquid control system pump suction required by Technical Specification 3.4.C.2.
2. Local temperature instrumentation used for primary coolant conductivity verification required by Technical Specification 3.6.

3. Local temperature instrumentation used for primary coolant pH measurements required by Technical Specifications 3.6.

This is a Severity Level V Violation (Supplement I) and is applicable to Units 1, 2, and 3.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Temperature measuring devices (thermometers) were purchased to be accurate enough for technical specification applications. Plant personnel failed to recognize the significance of requiring written vendor certification of accuracy.

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

Certification is available and will be obtained from the supplier.

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

Only certified thermometers will be used to monitor temperatures required by technical specifications. A calibration program will be established.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by January 1, 1983 when thermometers used to monitor temperatures required by technical specifications will be certified and a calibration program established.

#### Appendix B

##### Deviation (82-24-01)

Licensee Event Report 259/81-07 dated March 10, 1981, which reported an inoperable fire damper due to paint buildup on a broken fuse link, stated a procedure would be written for inspection and preventive maintenance on all fire dampers.

Contrary to the above, as of September 3, 1982, no procedure had been generated to perform the inspection of fire dampers; however, the licensee has closed out Licensee Event Report 259/81-07 as having been completed.

Response

The corrective action in LER BFRO-50-259/81007 related that a procedure would be written for the inspection and preventative maintenance of fire door dampers. In addition, the separated fusible link which initiated the event was to be replaced. The inspection and maintenance activities were to be included in a detailed procedure which was in the process of being prepared for all CSSC, radiological, and vital area doors. This inspection and maintenance step was inadvertently omitted from the procedure.

The tracking procedure for action commitments included the replacement of the separated link but did not list the needed procedure change. The link was replaced and the open item was closed.

Corrective Actions Which Have Been Taken or Will Be Taken

MMI 116 was revised on September 10, 1982 to include an inspection of fire doors with automatic closing louvers. These louvers were all inspected per the revised procedure on September 11, 1982. An instruction memorandum has been written to the compliance staff personnel responsible for tracking commitments to verify all completed items by personally viewing documentation or having a written statement from responsible supervisors that all work has been completed.

Corrective Actions Which Will Be Taken To Avoid Further Deviations

No further action is required.

Date Corrective Actions Were or Will Be Completed

Corrective actions were completed on October 26, 1982.