

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority  
Browns Ferry 1, 2, & 3

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

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

- A. 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.

- B. 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 on site; actually 41 are on site.
  - 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.

- C. 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 Specification 3.6.

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

Tennessee Valley Authority  
Notice of Violation

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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: OCT 07 1982