

RESPONSE TO NRC-OIE LETTER OF OCTOBER 10, 1978,
CONCERNING RII:RVL 50-260/78-22

Finding

Criterion XVII of Appendix B to 10 CFR 50 requires that sufficient records be maintained to furnish evidence of activities affecting quality. Standard Practice BFA-8, in its implementation of this criterion, establishes the qualifications that quality assurance records shall have.

Contrary to the above, various examples of undated and unsigned changes to quality assurance records were identified in the documentation of refueling test instruction results for RTI's 4, 5, 13, 22, and 26 performed subsequent to the May/June 1978 core refueling.

This item is a deficiency.

Response

Corrective Steps Taken and Results Achieved

A discussion was held with appropriate supervisors including quality assurance concerning the failure to initial and date changes on refueling test instructions.

Corrective Steps Which Will Be Taken to Avoid Further Noncompliance

No refueling test instructions will be approved until all changes are properly documented.

Date Full Compliance Will Be Achieved

Full compliance was achieved on August 23, 1978.

Finding

Technical Specification paragraph 6.3.A requires, in part, that surveillance and testing requirements be performed by adherence to detailed procedures that have been prepared and approved for the activity in question. Paragraph 4.0, "Surveillance Instruction content," of Section 4.5, Part II, of the Operational Q/A Manual, in its implementation of the Technical Specification requirement for the preparation of surveillance testing procedures, requires, in part, that the procedures contain a statement of the surveillance requirements and that performance of these requirements should provide assurance that the Technical Specifications relating to the system being tested are satisfied.

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Finding (Continued)

Contrary to the above, performance of LPRM Calibration Procedure S.I.4.1.B-3, as presently written, does not provide assurance that the Technical Specifications relating to the Local Power Range Monitor System as specified in Table 4.1.B and Section 1.V.1 of the Technical Specifications are satisfied.

This is a deficiency.

Response

Corrective Steps Taken and Results Achieved

LPRM calibration procedure SI 4.1.B-3 will be revised to require LPRM meter adjustment at each required calibration for all LPRM's exhibiting gain adjustment factors greater than 1.10 or less than 0.90. This is the tolerance currently recommended by the General Electric Company for LPRM calibration.

Corrective Steps Which Will Be Taken to Avoid Further Noncompliance

A technical specification change request will be submitted to clarify calibration requirements in Table 4.1.B.

Date Full Compliance Will Be Achieved

Full compliance will be achieved by revising the subject surveillance instructions by November 15, 1978. The technical specification revision should be submitted to NRC by January 1, 1979.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

OCT 10 1978

In Reply Refer To:
RII:RVL
50-260/78-22

Tennessee Valley Authority
Attn: Mr. N. B. Hughes
Manager of Power
830 Power Building
Chattanooga, Tennessee 37401

Gentlemen:

This refers to the inspection conducted by Mr. R. Vogt-Lowell of this office on August 15-18, 1978, of activities authorized by NRC Operating License No. DPR-52 for the Browns Ferry Unit 2 facility, and to the discussion of our findings held with Mr. J. G. Dewease at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

During the inspection, it was found that certain activities under your license appear to be in noncompliance with NRC requirements. These items and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within 20 days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

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Tennessee Valley Authority

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OCT 10 1974

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,



F. J. Long, Chief
Reactor Operations and
Nuclear Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. Inspection Report No. 50-260/78-22

cc w/encl: Mr. J. G. DeWease
Plant Superintendent
Box 2000
Decatur, Alabama 35602