

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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January 10, 1983

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:

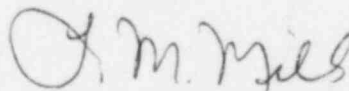
Please reference our letter to you dated November 24, 1982 in response to R. C. Lewis' October 21, 1982 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/82-33, -260/82-33, -296/82-33. Enclosed is our revised response to item A.1 of Appendix A, Notice of Violation. This revised response is being submitted in accordance with a December 10, 1982 telephone conversation with your staff. As a result of that conversation, TVA requests that NRC provide a written interpretation of the requirements of IWP-6210 and IWV-6210.

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

REVISED RESPONSE - NRC INSPECTION REPORT NOS.
50-259/82-33, 50-260/82-33, AND 50-296/82-33
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED OCTOBER 21, 1982

Item A (259, 260, 296/82-33-02)

10 CFR 50.55a(g) requires the licensee to conduct inservice tests to verify the operational readiness of pumps and valves in accordance with ASME Section XI (74S75).

Contrary to the above, maintenance of summary status listing for pumps and valves and increased test frequency for two pumps were not accomplished in accordance with ASME Section XI as described below:

1. ASME Section XI, IWP-6210, and IWV-6210 requires that the licensee maintain summary lists of pumps and valves which portray the current status of the testing program. The licensee did not prepare or maintain the required lists.
2. ASME Section XI, IWP-3230, requires a doubling of pump test frequency when pump test values fall into its specified "Alert Range." Test values obtained for RHR Service Water pump B-1 on 3/20/82 and for Emergency Equipment Cooling Water pump B-3 on 7/24/82 were in the "Alert Range." The licensee failed to increase the test frequency for these pumps.

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

Item A.1

1. Admission or Denial of the Alleged Violation

TVA admits the violation did occur based on the NRC inspector's interpretation of ASME Section XI (IWP-6210 and IWV-6210) requirements.

2. Reasons for the Violation if Admitted

The plant and the NRC inspector disagreed on what constitutes a summary listing. In accordance with ASME Section XI, IWP-6210 and IWV-6210, a summary listing of all pumps and all valves contained in Browns Ferry Nuclear Plant's ASME Section XI test program is maintained to show the current status of the test program. In addition, an accumulative listing of test results of each component, both pumps and valves, is maintained to show the current status of each component. The current status of the test program can be found in the latest ASME Section XI test program submittal to NRC. The current status of each component can be

found in the accumulative surveillance instructions maintained by the cognizant engineer. Section XI information is maintained as stated but is not kept in one centralized location. It was the opinion of the inspector that the intent of Section XI was to have all associated information available in one location. At the time the inspector identified his problem to plant personnel, he was informed by Browns Ferry personnel that the summary listing existed per the preceding paragraph and was felt to be adequate to meet the requirements of IWP-6210 and IWV-6210. This is the only inspection since Browns Ferry Nuclear Plant's Section XI program was first submitted in March 1977 that questioned whether the Browns Ferry summary listing did not meet the intent of IWP-6210 and IWV-6210.

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

None have been taken at this time.

4. Corrective Steps Which Have Been Taken to Avoid Further Violations

The plant will revise instructions to implement a program requiring each cognizant engineer to submit a pump and valve summary listing update along with ASME Section XI surveillance instructions (SIs). A master summary listing will be maintained in one central location and updated to reflect the current status of the pump and valve test program. TVA requests that NRC provide a written interpretation of the requirements of IWP-6210 and IWV-6210. Our proposed program will be evaluated against this written interpretation and modified if necessary so no further disagreements will occur on this matter.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by January 31, 1983. If any changes are required to plant instructions to accommodate the requested NRC interpretation, they will be completed within 30 days of receipt of this interpretation.