

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority  
Browns Ferry

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

As a result of the inspection conducted on September 28 - October 1, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. 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).

- B. 10 CFR 50, Appendix B, Criterion V, as implemented by Topical Report TR 75-01, paragraph 17.2.5, requires the licensee to ensure that activities affecting quality are prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and that these instructions, procedures, or drawings include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, the licensee did not ensure that two documented nondestructive testing procedures were appropriate under all circumstances encountered, nor did he ensure that the procedures included appropriate quantitative or qualitative acceptance criteria for determining that nondestructive testing objectives would be satisfactorily accomplished as described below:

1. Procedure N-UT-4R2, "Ultrasonic Examination of Nuclear Uncladged Vessels and Nozzles in the Thickness Range of 0.20 Inches to 2.5 Inches", is intended for use in performance of inservice inspections and is required to comply with the applicable Code specified by 10 CFR 50.55a(g), which is ASME Section XI (74S75). The Code requires that the procedure assure the entire volume of metal contained beneath the surface to be examined. However, for material thicknesses of 2 to 2½ inches, instructions given in N-UT-4 are inappropriate in that they can result in incomplete examination of the required volume through improper specification of a calibration point.

The Code depicts the required metal coverage for inspections like those covered by N-UT-4 in Code Figures IWB-3511 and IWB-3512. However, N-UT-4 inappropriately depicts the required coverage in accordance with Code Figure IWB-3510.

2. Procedure N-RT-1R0, "Radiography Examination of Nuclear Power Plant Components", provides instructions that are inappropriate and does not contain detail required to assure that its intended objectives are satisfactorily accomplished in that:

- (a) Details of the following requirements for performance of the radiography were not directly in the procedure but were referenced from documents (ASME Code Sections) not readily available to personnel performing radiography:

- Maximum x-ray voltage
- Maximum source size
- Source to film distance
- Penetrameter placement
- Film quality
- Geometrical unsharpness
- Employment of penetrameters and shims
- Image quality requirements
- Acceptance standards

- (b) The revisions of the ASME Code Sections referenced by N-RT-1 were not identified.

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

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: October 21, 1982