

TENNESSEE VALLEY AUTHORITY
USNRC-REGION II
ATLANTA, GEORGIA CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

82 SEP 8 P 1: 57

September 1, 1982

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

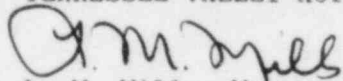
Dear Mr. O'Reilly:

Please reference our response dated October 28, 1981 to R. C. Lewis' September 28, 1981 letter to H. G. Parris regarding Report Nos. 50-259/81-26, -260/81-26, and -296/81-26 concerning activities at the Browns Ferry Nuclear Plant which appeared to violate NRC requirements. Enclosed is our revised response to item B of Appendix A, Notice of Violation. 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

Item B -- (260/81-26-02)

Technical Specification 3.1 requires that a minimum of instrument channels must be operable as given in Table 3.1.A. The table requires that 2 average power range monitor (APRM) channels per trip system be operable for high flux protection during reactor power operation.

Contrary to the above, from 9:30 p.m. on July 8, 1981, until 10:30 a.m. on July 9, 1981, the APRM channels were not operable as required in Table 3.1.A nor was the proper action taken within the time period stated in the table notes, in that the trip setpoints on the APRMs were set above the value given in the Table for a period of 13 hours.

This is a Severity Level IV Violation (Supplement I.D.2.) and is applicable to Unit 2.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Before the startup of unit 2, the R factor ($\frac{FRP}{CMFLPD}$; see technical specification 4.1) setpoint of 1.0 was not reduced by the shift technical advisor (STA) as is the routine practice. When the STA recognized that the R factor was not in the required limits, he took immediate corrective action to reduce the R factor. His corrective actions were complicated by a drifting local power range monitor.

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

As noted in the violation, the R factor was returned within limits. A revision to the unit 1 technical specifications has been approved by NRC which makes the neutron flux scram limiting safety system setting a limiting condition for operation with a 6-hour limit for returning to within limits. An identical item to units 2 and 3 technical specifications has been submitted.

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

A written guideline (Reactor Engineering Guideline 6) has been provided to the STAs with detailed instructions on how to maintain "R" factor within technical specification limits during startups as well as during

normal operation. As stated above, revisions to unit 2 technical specifications have been submitted to NRC for approval. These technical specification changes, in combination with adherence to the new procedure, will serve to prevent recurrence of this type of event.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on June 22, 1982 when Reactor Engineering Guideline 6 was issued. However, implementation of all identified corrective actions will not be achieved until requested revisions to the unit 2 technical specifications are approved.