



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

FEB 05 1991

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)	Docket Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

BROWNS FERRY (BFN) SAFETY EVALUATION REPORT (SER) - MAY 31, 1990, SAFETY EVALUATIONS ON THE TENNESSEE VALLEY AUTHORITY EMPLOYEE CONCERNS SUBCATEGORY REPORTS - BFN, UNITS 1, 2, AND 3 -- DOCUMENTATION RELATIVE TO CORRECTIVE ACTION PLAN (CAP) DEVIATION TO CORRECTIVE ACTION TRACKING DOCUMENT (CATD) 20406-BFN-01

The purpose of this letter is to provide NRC the documentation relative to a deviation to the CAP for BFN CATD 20406-BFN-01. This CATD is a part of the Employee Concerns Task Group (ECTG) report 20400, "Engineering Organization and Operating Procedures."

The May 31, 1990, BFN SER included evaluations against ECTG report 20400, and the evaluations were based on the originally-approved CAPS for BFN CATDs written under ECTG report 20400.

Enclosed is TVA's submittal correspondence relative to a Level II CAP deviation to CATD 20406-BFN-01. The proposed Level II deviation to the CATD was approved in accordance with TVA Nuclear Power Standard 1.4.2., "Resolution and Closure of Employee Concerns Special Program Corrective Action Tracking Documents," (NP-STD-1.4.2). The responsible BFN line organization was notified of approval of the CAP deviation to CATD 20406-BFN-01 on January 17, 1991.

TVA has not committed in NP-STD-1.4.2 to routinely notify the NRC concerning the approval of Level II CAP deviations to CATDs except through the issuance of an annual report. However, since the subject BFN SER addressed ECTG 20400, the CAP deviation to CATD 20406-BFN-01 is being forwarded for your information in response to a telephone request by Paul Corland of NRC.

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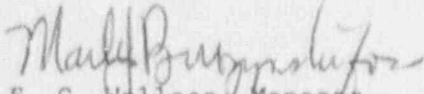
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U.S. Nuclear Regulatory Commission

If you have any questions, please telephone T. L. Pitts of my staff at (615) 751-8087.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



E. G. Wallace, Manager
Nuclear Licensing and
Regulatory Affairs

Enclosure

cc (Enclosure):

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UNITED STATES GOVERNMENT

Memorandum

TENNESSEE VALLEY AUTHORITY

TO : L. C. Ellis, Manager, Employee Concerns Special Program/Closeout
Team, CSTIIA-C

FROM : J. R. Rupert, Project Engineer, Browns Ferry Engineering Project,
Nuclear Engineering, EDB 1A-BFN

DATE : DEC 06 1990

SUBJECT: BROWNS FERRY NUCLEAR PLANT (BFN) - CORRECTIVE ACTION TRACKING DOCUMENT
(CATD) 20406-BFN-01

- References:
1. Memorandum from J. D. Hutson to S. H. Rudge dated May 14, 1990 (B22 900514 001)
 2. Your memorandum to S. H. Rudge dated July 23, 1990 (W35 900720 800)

The purpose of this memorandum is to provide an amended corrective action plan (CAP) for the subject CATD. Reference 1 submitted a deviation to the original CAP for review and approval by the Senior Management Review Group (SMRG). The deviation read as follows:

20406-B 1 - Design Control Improvements

The CAP states that the requirements of Nuclear Engineering Procedure (NEP) 6.3 and 6.4, which generally implement the Plant Modification Package (PMP) concept, will be implemented by Browns Ferry Engineering Project (BFEP) Project Instruction (PI) 86-03. The change control procedure which was actually developed and is currently in use is described in BFEP PI 89-06. This procedure does not utilize the PMP concept given in NEP 6.3 and 6.4 but when combined with Site Director Standard Practices 8.10 and 8.11 accomplishes the overall controls in a more easily implemented manner.

The PMP concept was implemented at SQN and through that experience it was determined to be too cumbersome to allow timely accomplishment of plant modifications. The process described in BFEP PI 89-06 incorporates experience gained from the SQN restart effort and BFN site review and closure processes and is equivalent to the process of NEP 6.3 and NEP 6.4 in the degree of design and configuration control that is imposed.

At the request of the Nuclear Quality Assurance, as stated in reference 2, we are adding the following statement to the CAP deviation.

The Nuclear Performance Plan has been revised to read "TVA's permanent design control system will further develop the plant modification package concept."

This statement added after the last sentence in paragraph one of the deviation above provides the basis for implementing the design change control process described in BFEP PI 89-06 which enhanced the PMP concept.



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L. C. Ellis

DEC 06 1990

BROWNS FERRY NUCLEAR PLANT (BFN) - CORRECTIVE ACTION TRACKING DOCUMENT
(CATD) 20406-BFN-01

To preclude the processing of this minor change to the CAP deviation from going through the complete SMRG review process again, I am requesting you provide this addition to NQA to provide evidence that the comment has been incorporated. This should expedite the process to allow BFN to submit the CATD package for closure review.

If further assistance is needed, contact J. L. Walton at extension 5063.


J. R. Rupert
FOR

JEM:JEO:JLW:LP

cc: RIMS, ET SLE 26P-K
J. E. Maddox, EDB 1A-BFN

JEM
12/6/90
JEM

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ECTG Corrective
Action Tracking Document
(CATD)

INITIATION

Applicable ECTG Report No.: 204 06(C)

1. Immediate Corrective Action Required: Yes No
2. Stop Work Recommended: Yes No
3. CATD No. 204 06 BFN 01
4. INITIATION DATE 5-8-87
5. RESPONSIBLE ORGANIZATION: DNE BFN
6. PROBLEM DESCRIPTION: QR NQR
COMPLETION OF THE PROGRAMS COMMITTED TO IN THE BFNPP ATTACHMENT IV-2
IS NOT EVIDENT:
○ III-52 REVIEW OF ECNs ISSUED SINCE OL (BFEP PI-86-14,20)
○ III-57 REVIEW OF ECNs ISSUED SINCE OL (BFEP PI-86-14,20)
○ III-64 IMPLEMENT NEP-6.3 (PMP PROCEDURE) ATTACHMENTS
7. PREPARED BY: NAME SKIP DEW DATE: 5-8-87
8. CONCURRENCE: CEG-H Dennis R. Kinnitt DATE: 5-15-87
9. APPROVAL: ECTG PROGRAM MGR. M. S. Martin DATE: 5-20-87

CORRECTIVE ACTION

10. PROPOSED CORRECTIVE ACTION PLAN: _____

(See Attachment A)

11. PROPOSED BY: DIRECTOR/MGR: D.L. Hall ATTACHMENTS DATE: 7-25-87
12. CONCURRENCE: CEG-H: Dennis R. Kinnitt DATE: 7-30-87
- ECTG PROGRAM MANAGER B. R. Lehto DATE: 6/1/87

VERIFICATION AND CLOSEOUT

13. Approved corrective actions have been verified as satisfactorily implemented.

SIGNATURE

TITLE

DATE

CATD NO. 20406-BFN-01

10. PROPOSED CORRECTIVE ACTION PLAN:

The plant modification package (PMP) process has been in place at BFN since the implementation of BFEP PI 86-03 on 6-16-87. NEP 6.3 and NEP 6.4 will provide further design change control improvements by integrating the PMP developed in BFEP PI 86-03 with improved methods of documenting, administering, and controlling design changes and implementing these as corporate wide procedures. NEP 6.3 and NEP 6.4 will be issued by September 1987 and implemented by December 31, 1987. BFEP PI 86-03 will then be revised to reference NEP 6.3 and NEP 6.4. III-52 and III-57 are Volume 3, NPP commitments, and are tracked as such by BFEP, ONP, corporate DNE and the NRC. Those items listed as unit restart items will be completed prior to unit restart. The review of ECNs issued since the granting of the OL are being performed by the Design Baseline and Verification Program (DB&VP) in accordance with BFEP PI 86-14 R1, PI 86-20 R1, PI 86-21 R0, and PI 87-24 R1. The schedule for evaluation of ECNs not required for safe shutdown systems will be determined after restart.

Does the corrective action plan rely on or take credit for currently identified or previously completed work? Yes X No _____

If yes, list parent documents (e.g. NCR, SCR, CAR, Audit, etc.) _____

BFEP PI 86-03, NEP 6.3, NEP 6.4, and the DB&VP

Does the problem described constitute a condition adverse to quality (CAQ)?
Yes _____ No X No CAQs are known. Any identified by DB&VP will be documented at the time of discovery.

If Yes, CAQ No. _____

Schedule for completion of corrective action (schedule date, if known, or milestone (e.g. BFLI, etc.)) See schedule above

11. RH Roberson / 7-24-87
Prepared by/Date

Thomas E. Custer / 7/24/87
Proposed by/Date
Thomas E. Custer