

Tennessee Valley Authority. Post Office Box 2000, Decator Atabama, 35609.

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

Gentlemen:

In the Matter of Tennessee Valley Authority Docket No. 50-260

## BROWNS FERRY NUCLEAR PLANT (BFN) - FOLLOW-UP TO ENFORCEMENT CONFERENCE REGARDING T-QUENCHER COATING

On June 14, 1994, TVA and NRC met to discuss an apparent violation for failure to take timely corrective action to address the use of an unqualified coating on the Unit 2 T-quenchers. During this meeting, NRC requested that TVA review a December 23, 1991 letter to TVA from United States Senator Jim Sasser (Reference 1) in order to determine whether this letter constituted an opportunity to identify the coatings on the BFN T-quenchers. TVA has reviewed this letter and determined that it did not constitute a reasonable opportunity to identify the misapplication of a carbon steel qualified coating system on the stainless steel BFN T-quenchers.

The December 10, 1991 letter, from Mr. Lanson R. Rogers to the Honorable Jim Sasser, which is an enclosure to Reference 1, does not identify any specific concerns with coating at BFN. Rather, Mr. Rogers' letter criticizes an American Society for Testing and Materials (ASTM) coatings committee, promotes his in-situ paint testing technology, and advocates the use of commercial grade paints in safety-related applications. Mr. Rogers then goes on to make

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a general allegation that Browns Ferry was, to some degree, in violation of its own safety requirements for Level 1 coatings as specified in the BFN Final Safety Analysis Report (FSAR).

In order to place Mr. Rogers' letter in the proper context, it is necessary to understand the nature and type of coating initiatives that had been accomplished at BFN over the past several years. In November 1981, TVA developed a construction specification for the application of a suppression chamber protective coating. A contract was issued in March 1983 to refurbish the coatings on the internal surface of the suppression chamber and associated components. An additional contract was issued in November 1985 to refurbish the coating in the Unit 2 drywell and vent header. These contracts were implemented on Unit 2 during the early stages of the Cycle 5 outage, which started in September 1984.

In the 1988 timeframe, when Mr. Rogers left TVA, TVA's focus had narrowed to address the coating on certain purchased components installed within primary containment. As stated in Section III.14.3 of the Browns Ferry Nuclear Performance Plan (Reference 2), the FSAR commitment to utilize coatings qualified to the requirements of the American National Standards Institute were considered to be met for the inside primary containment surface. In order to address the purchased components coating issue, TVA was implementing a program to identify, quantify, and evaluate these coatings. The results of this program were provided to NRC in October 1989 (Reference 3). NRC approved this program in January 1991, as documented in Reference 4.

At the time of Mr. Rogers' December 10, 1991 letter, TVA had already refurbished the coatings on the inner surface of the primary containment and the components within the suppression chamber. The unqualified coating on purchased components had been identified, quantified, and evaluated. TVA had performed pre-operational reviews of the primary containment and associated systems and had returned Unit 2 to service. U.S. Nuclear Regulatory Commission Page 3

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Therefore, in February 1992, when TVA replied to the letter from the Honorable Jim Sasser (Reference 5), TVA had considered the best information available to it at the time and concluded that no safety concerns existed with protective coatings at BFN.

In summary, Mr. Rogers' letter express no specific concerns with regards to the improper use of unqualified coatings, and certainly gave no indication of concern about the coating of surfaces that should have remained uncoated. TVA was aware of various coating issues at BFN during the 1980's timeframe and TVA took extensive corrective actions to resolve these concerns. In view of the above, TVA does not consider Mr. Rogers' letter to contain any significant information which would have provided a reasonable opportunity to specifically identify the T-quencher coating issue.

There are no commitments contained in this letter. If you have any questions, please telephone me at (205) 729-2636.

Sincerely

Pedro Salas Manager of Site Licensing

cc: see page 5

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References:

- Letter from the Honorable Jim Sasser, United States Senator, to TVA, dated December 23, 1991, in regards to correspondence from Lanson R. Rogers, President of Coatings and Testing Corporation
- TVA letter to NRC, dated October 24, 1988, Browns Ferry Nuclear Plant (BFN) - Nuclear performance Plan, Revision 2
- TVA letter to NRC, dated October 4, 1989, Containment Coatings
- NRC letter to TVA, dated January 23, 1991, NUREG-1232, Volume 3, Supplement 2 - Browns Ferry, Unit 2 [Section 3.7]
- Letter from TVA to the Honorable Jim Sasser, United States Senator, dated February 11, 1992, in regards to correspondence from Lanson R. Rogers, President of Coatings and Testing Corporation

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