#### TENNESSEE VALLEY AUTHORITY

CHATTANOOGA. TENNESSEE 37401 400 Chestnut Street Tower II

December 29, 1982

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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:

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Please reference my letter to you dated October 22, 1982 in response to R. C. Lewis' September 21, 1982 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/82-24, -260/82-24, -296/82-24. Enclosed is our supplemental response to item C 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

#### ENCLOSURE SUPPLEMENTAL RESPONSE TO NRC INSPECTION REPORT 50-259/82-24, -260/82-24, -296/82-24 R. C. LEWIS' LETTER TO H. G. PARRIS DATED SEPTEMBER 21, 1982

#### Item C - (259/82-24-02)

Technical Specification 6.3.A.6 requires that detailed written procedures shall be adhered to for surveillance and testing requirements. Surveillance Instruction (SI-2), Instrument Checks and Observations, requires that if a recirculation pump speed is unavailable, then both recirculation pump generator speeds shall be recorded daily.

Contrary to the above, the requirement was not met in that from July 18 to July 25, 1982 recirculation pump speed A was unavailable and pump generator speeds were not recorded as required.

This is a Severity Level V Violation (Supplement I) and is applicable to unit 1.

#### 1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The operator failed to use the reference note in SI-2, Instrument Checks and Observations, as required when one of the recirculation pump speed indicators is not functioning properly. The reference note specifies that percent generator speed readings are adequate as a substitute for pump speeds. Although this was not properly recorded for a "recirc pump speed" during this week, it should be noted that percent generator speeds (+5%) were documented on SI 4.6.E-1, Jet Pumps, data sheets thus permitting operator signoff for "jet pump mismatch." (This document is adequate to satisfy the requirements of Technical Specifications 3.6.F.1 and 4.6.F.1.)

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

Operators have been instructed to follow instructions of SI-2 for recirculation pump speed documentation. Additionally, Table SI-2, Instrument Checks and Observations, has been revised to indicate specific plant section review responsibilities by qualified nonlicensed personnel for each item listed in SI-2. The timeliness of this independent third-stage review has been emphasized to each plant section supervisor.

It should be noted that acceptable alternate generator speed readings (SI-96-3A and SI-96-3B) were taken to satisfy the requirements of SI 4.6.E-1, Jet Pumps, during the period in question.

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# 4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Senior reactor operator (SRO) reviewers will be instructed to exercise more care in their review of all routine SI surveillance tests.

## 5. Date When Full Compliance Will Be Achieved

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Full compliance will be achieved by January 31, 1983, upon issuance of a memorandum to all SRO reviewers.

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