

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

USNRC REGIONAL
ATLANTA, GEORGIA

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June 24, 1983

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

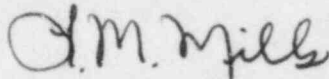
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' May 26, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-14, -260/83-14, -296/83-14 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our response to 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

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Q PDR

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-14, 50-260/83-14, AND 50-296/83-14
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED MAY 26, 1983

Appendix A (259, 260, 296/83-14-01)

10 CFR 50, Appendix B, Criterion XVI, and the accepted Quality Assurance Program, Section 17.2.16, require that measures be established to assure that conditions adverse to quality are promptly corrected.

Contrary to the above, measures have not been established which assure that conditions adverse to quality are promptly corrected as evidenced that over 110 deficiencies, documented for disposition on Corrective Action Reports, are considered by the licensee to be delinquent. Examples of delinquent Corrective Action Reports dating to 1981 are identified as follows: 81-40-OT, 81-51-OT, and 81-74-OT.

This is a Severity Level IV Violation (Supplement I). A similar problem was identified in our letter dated April 29, 1982.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

In many cases plant personnel did not submit a satisfactory response to corrective action reports (CARs)/discrepancy reports (DRs) within the required time (14 working days and 5 working days, respectively). After a satisfactory response was received, there were a large number of instances when plant personnel did not complete the proposed corrective actions by the dates agreed upon with Field Quality Engineering Section. This was due to insufficient management attention to the corrective action report program in that timely responses and timely corrective actions were not required of plant personnel.

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

On April 5, 1983, which was before the NRC inspection, additional manpower was assigned to the corrective action report program by Field Quality Engineering. This manpower level is still assigned.

After the NRC exit meeting on April 22, 1983, the plant superintendent requested the Field Quality Engineering supervisor to prepare an action plan to address the problems discussed by the NRC inspector. This action plan was reviewed and approved by the plant superintendent on April 27, 1983.

On April 29, 1983, the plant superintendent issued a memorandum to the assistant plant superintendents and plant supervisors. This memorandum delineated the actions to be taken by plant supervisors to eliminate the backlog of delinquent CARs/DRs and to prevent the recurrence of a backlog. In this memorandum, the plant superintendent made it clear that he expected the effort to be given a high priority.

In response to a discussion between TVA and NRC officials, all open CARs at the Browns Ferry Nuclear Plant were rereviewed. This rereview was conducted on April 30, May 1, and May 2, 1983 and it was again verified that there were no open items which might adversely affect plant safety. The results of this reverification were presented to the plant superintendent on May 3, 1983. It was determined that none of the open CARs have any outstanding corrective actions which would affect the safety operation of the plant.

In management meetings during late April and all of May, the plant superintendent continued to express strong interest in the CAR/DR program.

On June 2, 1983, the plant superintendent met with all plant supervisors to discuss the CAR/DR program. At this meeting Field Quality Engineering made a presentation on the current program requirements and the status of all open CARs/DRs. The plant superintendent reiterated his support for the program and his interest in meeting the goals set out in the action plan.

Results achieved are that as of June 2, 1983, the status of open CARs/DRs at Browns Ferry Nuclear Plant was as follows:

- Open CARs - 71
- Delinquent CARs - 20
- Open DRs - 24
- Delinquent DRs - 10

For comparison, the status on April 1, 1983 was as follows:

- Open CARs - 161
- Delinquent CARs - 74
- Open DRs - 92
- Delinquent DRs - 50

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

1. The action plan activities for removing the backlog of delinquent CARs/DRs will continue until completed.
2. The plant superintendent will take prompt action to keep responses from plant personnel current, to resolve disagreements between plant personnel and Field Quality Engineering, and to ensure completion of corrective actions in a timely manner.
3. Standard Practice BF 10.3 will be revised to clarify the CAR/DR program requirements and to improve administrative controls.

5. Date When Full Compliance Will Be Achieved

Standard Practice BF 10.3 will be revised and the present backlog of delinquent CARs/DRs will be eliminated by August 1, 1983. In the future, the number of delinquent CARs/DRs will be kept to a minimum. The plant superintendent will continue to take prompt action to keep program activities current.