

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

January 9, 1984

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

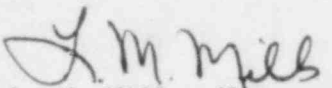
Dear Mr. O'Reilly:

Enclosed is our response to D. M. Verrelli's December 8, 1983, letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-52, -260/83-52, -296/83-52 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 Damer 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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PDR ADOCK 05000259
Q PDR

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-52, 50-260/83-52, AND 50-296/83-52
D. M. VERRELLI'S LETTER TO H. G. PARRIS
DATED DECEMBER 8, 1983

Appendix A

Item A (259, 260, 296/83-52-03)

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented procedures or instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures.

Contrary to the above, the requirement was not met in that no procedure was available to describe the correct switch alignment of the backup control panel (panel 25-32) while in a standby condition. Examples were found of incorrect switch alignment as listed below:

- (1) RCIC flow controller in "manual" on Unit 2 and 3, RCIC flow controller in normal position of "automatic" on Unit 1.
- (2) Main steam isolation valves control switches in "close" position on Unit 2 vice the normal "auto open" position as on Units 1 and 3.

This is a Severity Level V Violation (Supplement I) and applicable to all units.

1. Admission or Denial of the Alleged Violation

TVA admits to the violation in that the controlling procedure, "Control Room Abandonment," did not ensure proper switch alignment if at any time transfer valve control to the backup control panel became necessary.

2. Reasons for the Violation if Admitted

The violation occurred because of procedural inadequacy. However, it must be noted that switches on the backup control panel have no predetermined "correct" alignment since the condition of the unit at the time the switches are used determines the correct switch positions. Therefore, it is not considered reasonable to specify in a single procedure the proper switch alignment for all possible plant circumstances.

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

Operations personnel immediately placed the switches into positions corresponding to unit operating status at the time of discovery. The plant procedure for control room abandonment has been revised to require that switches be checked for the desired alignment corresponding to existing plant conditions before any transfer of valve control to the emergency position.

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

No further corrective action is required.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on December 28, 1983, when the procedure for control room abandonment was revised.

Item B (259, 260, 296/83-52-02)

Technical Specification 6.4.i requires that the Plant Operations Review Committee (PORC) review the Industrial Security Program on an annual basis.

Contrary to the above, the requirement was not met in that no record of the review could be located. The review was last completed in April 1982 and was scheduled for April 1983. A search of PORC minutes revealed no record of review since the last review of 1982.

This is a Severity Level V Violation (Supplement I) and applicable to all units.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred in that this review was not performed between April 1982 and November 1983, but that a review was accomplished in both calendar year 1982 and 1983 as noted in the inspection report.

2. Reasons for the Violation if Admitted

The violation occurred because of personnel oversight. Periodic PORC review of items such as this is tracked on the PORC action item log.

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

Immediately upon discovery, PORC performed a review of the Industrial Security Program.

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

Annual PORC review of various programs, as well as the importance of the PORC Action Item Log, will be discussed in an upcoming PORC meeting. As an added precaution, annual PORC review of this security program has been included in the Public Safety Service Audit/Inspection Tracking System.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on November 17, 1983, when PORC reviewed this program. Discussions with PORC will be completed by January 15, 1984.