

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2 and 3

Docket Nos. 50-259, 260 and 296
License Nos. DPR-33, 52 and 68

As a result of the inspection conducted on July 26 - August 25, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. 10 CFR 50, Appendix B, Criterion V, requires activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. Recirculation system Special Test Instruction (STEAR) 83-01 delineated certain requirements with respect to Unit 2 recirculation system vibration and leak detection. The special test was implemented to satisfy commitments as delineated in TVA/NRC Meeting of January 6, 1983, and TVA letter dated January 25, 1983.

Contrary to the above, the requirements of STEAR 83-01 were not met in that several procedural requirements were not satisfied. Examples of failure to adhere to STEAR 83-01 include:

- (1) STEAR 83-01 requires recirculation system vibration readings be taken twice a day (once every 12 hour shift) by the Shift Technical Advisor (STA).

Contrary to this, over the reviewed period from July 1 to August 16, 1983, 22 vibration readings were not logged on the data log (figure 25 of STEAR 83-01) as being taken.

- (2) STEAR 83-01 requires recirculation system leak detection readings be taken twice a day by the STA.

Contrary to this, over the reviewed period from July 1 to August 16, 1983, 36 leak detection readings were not logged on the required data log (figure 25 of STEAR 83-01) as being taken. In addition, on 7 days, no leak detection readings were recorded as being taken.

- (3) STEAR 83-01 requires data logs be taken in accordance with the Plant Operations Review Committee (PORC) approved figure 25 logsheet in STEAR 83-01.

Contrary to this, data logs were taken from July 1 to August 16, 1983, on a non-PORC approved hand-generated log sheet. The hand-generated log sheet did not incorporate the log checkoff requirements for verifying leak detection equipment status as required by STEAR 83-01.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 2.

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

Contrary to the above, this requirement was not met in that electrical cable tray seismic hold-down clip restraints required to be installed in the Unit 1, 2, and 3 cable spreading rooms in accordance with TVA drawings 48N1040, 48N1041 and 45N830 were not properly installed. A licensee survey of the cable spreading rooms indicated the following deficiencies: Unit 1: 25 deficiencies; Unit 2: 18 deficiencies; and Unit 3: 21 deficiencies.

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

- C. Technical Specification 6.3.A.6 requires that detailed written procedures shall be prepared to cover surveillance and testing requirements.

Contrary to the above, this requirement was not met in that no procedure was written or used to address the method of APRM gain adjustments as performed by the shift nuclear engineer at 7:58 p.m. on July 16, 1983. The shift nuclear engineer was directed by the shift engineer to reset APRM gain factors in order to effectively reduce the 'R' factor as required by Technical Specification 2.1.A.1.b.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 2.

- D. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instrument setpoint drawings are required to be updated in accordance with Browns Ferry Standard Practice 8.3.

Contrary to the above, adequate drawings were not maintained in that TVA drawings 47B601-64-7R and 47B601-64-8R were not revised to reflect a setpoint revision for drywell pressure required by Amendments 54, 49, and 26 of the respective units operating license.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: **SEP 21 1983**