

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2, and 3

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

The following violations were identified during an inspection conducted on February 26 - March 25, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, this requirement was not met in that Surveillance Instruction 4.8.B.2-3a (Airborne Effluents Weekly Gamma Isotopic) was inadequate and resulted in several errors being made during the performance of the instruction for the stack monitor (O-RE-90-252) and Unit 2 turbine building roof exhaust fan (2-RE-90-251). Although the procedure was recently revised on February 17, 1984, seven examples of problems or unclear instructions were identified as listed below:

1. Procedure 1053, Step II.C, requires that any Marinelli used on ventilation can samples should be identified uniquely and checked for background radiation prior to use. The breakers are not uniquely identified and are checked after five uses.
2. Procedure 1053, Step III.E, addressed the connection of sampling equipment according to a referenced figure but only one out of six figures displayed the pressure gauges needed to obtain data in the sample. During the collection of the samples, the equipment was not connected as specified.
3. Procedure 1053, Step F, requires that all sample valves be opened but these valves were not identified by valve numbers or the quantity of sample valves to open.
4. Procedure 1053, Step III.N, contains a formula for correcting the Marinelli beaker volume for pressure/vacuum effects. This formula, if used as implied, gives an incorrect answer. An incorrect calculation was made twice while being observed. The formula is as follows:

$$V_2 = \frac{(14.696 + \Delta P) \times V_1}{14.696}$$

Where ΔP = Gauge reading (positive number for excess pressure
negative number for vacuum)

The gauges used read out in inches of vacuum (30 inches equals 0 psia). However, the ΔP was added to 14.696 in units of psi. A conversion factor must first be made for the gauge reading to units of psi to use in the formula. An erroneous ' V_2 ' of 1783 was used for 0-RE-90-232 and 4287 and for 2-RE-90-251.

5. Procedure 1053 A, Step III, requires the recording of the as-found position of the inlet valves to the monitor but no place in the procedure provided a space to record the position of these valves. Further, on monitor 2-RE-90-250, no identification tags were on the valves to identify them.
6. S.I. 4.8.B.2-3a, Step 2, requires recording of stack monitor channel A and B readings in counts per second. The computer program run to evaluate the data requires only one entry for the counts per second and does not specify whether to average the two values, use the low, or use the high. The analyst was unsure what to use and the low value was used in the calculation.
7. S.I. 4.8.B.2-3a data cover sheet asks 'Yes' or 'No' whether the Technical Specification criteria and Surveillance Instruction criteria are satisfied; the rule or test that this judgement is being applied to is unclear and is not specified in the procedure.

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

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 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.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

APR 09 1984

Date: _____