TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

May 14, 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:

Please refer to my letter to you dated April 16, 1984, which contained our original response to Inspection Report 50-259/83-60, -260/83-60, and -296/83-60 for our Browns Ferry Nuclear Plant. Enclosed is our response to Violation 2 of Inspection Report 83-60, which I had indicated in my April 16, 1984 letter would be submitted by May 14, 1984. 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

D S Kammer

D. S. Kammer
Nuclear Engineer

Enclosure

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-60, 50-260/83-60 AND 50-296/83-60
RICHARD C. LEWIS'S LETTER TO H. G. PARRIS
DATED MARCH 14, 1984

Item 2 - 259, 260/83-60-01

10 CFR 50, Appendix B, Criterion X requires that a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

Contrary to the above, this requirement was not met in that prior to Unit 1 startup numerous work activities were not adequately inspected to insure proper material conditions. Standard Practice BF 12.18, Unit Prestartup Review, was inadequately performed in that completed maintenance was not verified completed. Examples of the above are as follows: (1) containment atmospheric dilution valves 84-8A/D support missing; (2) air solenoid valves to both reactor building to torus vacuum breakers not bolted down; (3) torus isolation valve for level transmitter 64-159B missing a body-to-bonnet retaining nut; (4) conduit for core spray pump motor leads '1D' not supported; (5) residual heat removal pump 'B' and 'D' area not adequately cleaned; (6) Power leads to core spray motor operated valve 75-30 conduit support brackets missing; (7) condensate transfer piping, Unit 1 reactor building (southend, elevation 565 ft.), cable support broken; (8) various valve packing gland retainers/lock nuts not installed or secured. Examples: 0-85-502, 1-77-661, vent valve for pressure indicator 85-2, instrument valves for level transmitters 64-159B, 64-159A; (9) several resistance temperature detector connecting wires pulled from conduit cables for torus temperature monitoring; (10) several electrical conduits on high pressure coolant injection system not mounted to support brackets; (11) Unit 2 RCIC steam supply line trap had damaged conduits due to overheating; (12) RHR pump 2D instrument line not mounted.

This is a Severity Level IV Violation (Supplement I) applicable to Units 1 and 2.

1. Admission or Denial of the Alleged Violation

   TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

   The deficiencies occurred because of inadequate attention to detail during modification and maintenance work and because of inadequate attention to overall equipment conditions in the plant.

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

All specific items identified in the report have been verified to have been corrected by the appropriate maintenance sections. In addition, detailed walk-throughs on units 1 and 2 were completed (unit 3 was in a refueling outage), and corrections to numerous other deficiencies were made.

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

As part of the Browns Ferry Regulatory Performance Improvement Plan, BF12.18 was revised on March 20, 1984, to provide more detailed guidance on housekeeping inspections before startup from refueling, and appropriate personnel have received training in housekeeping requirements and are making periodic routine inspections. For a number of engineering and supervisory personnel, this training included plant tours with the NRC Senior Resident Inspector.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on May 11, 1984, when verification of all specific deficiency corrective action was made.