

ENCLOSURE 1

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

The following violations were identified during an inspection conducted on December 26, 1983 - January 25, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions and procedures. The plant clearance procedure (Standard Practice 14.25) for tagout of equipment specifies requirements to be followed in placing equipment in and out of service.

Contrary to the above, the requirements of BF 14.25 were not met in that tagout clearance procedures were not followed for placing the root valve for pressure transmitter 64-137 and 64-138 back in service on October 18, 1983, on clearance 83-1232. The operator assigned to return the system to service did not place the valve in the open position and did not remove the tag attached to the valve. This resulted in the drywell to torus instrumentation being out of service during power operation. Additionally, the valve was not verified open during pre-startup valve lineups. The valve was found mispositioned 5 days after unit startup during a routine surveillance.

This is a Severity Level IV Violation (Supplement I) applicable to unit 1.

2. 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.

3. Technical Specification 6.3.A.1 requires that detailed written procedures be prepared, approved and adhered to related to plant startup and operation.

Contrary to the above, the requirement was not met in that:

- A. Operating Instruction 64 (Primary Containment System Startup Checklists and Valve Lineups) was found to be inadequate since it does not include the instrument isolation valves for the drywell and torus pressure sensing lines connected to pressure transmitters PDT 64-137 and PDT 64-138. Failure to have one of these valves in service resulted in both of the drywell to torus differential pressure instruments being out of service during power operation.
- B. General Operating Instruction 100-1 (Pre-startup Checklists) required that all chart recorders on panel 9-3 be placed in service prior to startup of Unit 1 on December 29, 1983. The recorder's torus pressure indicating circuit remained deenergized until January 10, 1984.

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

4. Technical Specification 3.6.B.3 requires that at steaming rates greater than 100,000 lb/hr., the reactor water quality chloride maximum limit of 0.5 ppm shall not be exceeded. Exceeding this limit shall be cause for placing the reactor in the cold shutdown condition.

Contrary to the above, this requirement was not met in that reactor water quality chloride exceeded 0.5 ppm from 0320 a.m. to 11:40 a.m. on December 31, 1983, without any action being taken to commence an orderly shutdown. An orderly shutdown was initiated at 12:20 p.m., December 31, 1983, due to water quality being out of specification and possible resin intrusion. Operational supervisory personnel were not made aware of the chloride out of specification condition until 11:05 a.m., December 31, 1983. An orderly shutdown was terminated at 2:35 p.m. after chloride concentration was confirmed to be within specification and the suspected source isolated.

This is a Severity Level IV Violation (Supplement I) applicable to Unit 1.

5. 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 Mechanical Instruments and Controls drawing 47W600-133 incorrectly showed the instrument lines between the drywell and torus to transmitters PT-64-135 and PDT-64-137. These lines were found reversed from the drawing indication during a resident inspector walkdown of the system. System operation was not impaired as the installation was correct with only the drawing in error.

This is a Severity Level V Violation (Supplement I) 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.

Date: MAR 14 1984