

ENCLOSURE 1NOTICE 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 March 26 - April 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 removing the tag on a piece of equipment when the equipment was returned to service. On April 5, 1984, a Unit 1 core spray valve (FCV 75-9) was noted to have a tag on the valve handwheel. The clearance (83-1260) had been cleared and the system returned to service on August 30, 1983. A similar violation was noted in report 83-60.

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

2. Technical Specification 6.3.A.1 requires that detailed written procedures, including applicable checkoff lists, shall be prepared, approved, and adhered to for normal startup, operation, and shutdown of the reactor and of all systems and components involving nuclear safety of the facility.

Contrary to the above, this requirement was not met in that Operating Instructions 32 and 32A, Control/Station Air and Drywell Control Air, do not contain all system valves in the valve lineup checklists. A random and partial sample of valves in the Reactor building identified that 9 valves on Unit 1 were not on any checklist (32-1421, 32-1422, 32-1423, 32-1424, 32-1425, 32-1228, 32-2145, 32-1336, 32-1255). These valves included the supply to the suppression chamber vacuum relief, drywell ventilation supply, and containment inerting valves. On Unit 2, valve 2-32-1755 (HPCI Control Air Supply) is missing from the valve checklist. Examples on Unit 3 are 3-32-2276, (HPCI Control Air) 3-32-2224, 3-32-2225 (Containment Inerting Control Air).

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

Tennessee Valley Authority  
 Browns Ferry 1, 2, and 3

2

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

3. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions or procedures. Browns Ferry Standard Practice 8.3 requires that plant modifications be completed by the use of a work plan.

Contrary to the above, the requirement was not met in that on April 24, 1984, old fuel racks were removed from the Unit 2 fuel pool without the use of a detailed or adequate work plan to address the task action requirements or procedural steps.

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

4. 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.

a. Contrary to the above, this requirement was not met in that control air system as-constructed drawings 47W847-9, 10, and 11 do not reflect the control air systems in the plant. On Unit 1, valve 1-32-1278, isolation to PC-68-106, is not on the drawing. Isolation valve to FCV-70-1 is labeled 1-32-2554 in the plant but is not numbered on the drawing. Isolation valve to FCV-68-106 is labeled 1-32-1279 but is not numbered on the drawing. On Unit 2, differences between plant valve identification tags and the drawings are 1278 (plant) versus 2121 (drawing), 1279 (plant) versus 2122 (drawing), 1894 (plant) versus no number (drawing), no label (plant) versus 2133 (drawing), 1397 (plant) versus 2132 (drawing), and 1781 (plant) versus 2139 (drawing). On Unit 3, the drawing does not show the valve between 2121, 2122 and 696, 2322. Valve 2133 on the drawing is not labeled in the plant.

b. Contrary to the above, this requirement was not met in that the following discrepancies in plant drawings, pressure switch setpoints, and annunciator were found as related to the fire protection area:

- (1) Browns Ferry Instrument Tabulation (Drawing 47B601-026, page 40) gives the setpoint of pressure switch PS-26-44 as 120 psi for the header pressure. As constructed drawing 45N644-1 gives the setting as 100 psi.
- (2) Design change request 1581, R1 dated 9/23/78 gives the setting of pressure switch PS-26-44A as 50 psig, but a setting of 60 psi is shown on drawing 45N644-1 and 35N731-9.
- (3) Annunciation for "Fire Protection Water Supply On" supplied from PS-26-44 was changed to "Raw Service Water Pressure Low" supplied from PS-26-44A. Logic diagram 47W611-26-13 incorrectly shows the alarm being supplied from PS-26-44. Also, the control diagram for the annunciator system, 47W610-55-2, incorrectly shows the title and pressure switch number for the annunciator as PS-26-44, "Fire Protection Water Supply On".

MAY 23 1984

Tennessee Valley Authority  
Browns Ferry 1, 2, and 3

3

Docket Nos. 50-25S, 260 & 296  
License Nos. DPR-33, 52, & 68

- (4) The installation of PS-26-44A is not correctly reflected in plant drawings. Flow diagram 47W836-1 shows an isolation valve for PS-26-44 but no valve for PS-26-44A. A valve is installed in the system. Panel drawing 47W600-51 does not show PS-26-44A on panel 25-139.

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

5. Technical Specification 6.3.A.6 requires that detailed written procedures for surveillance and testing requirements be prepared, approved, and adhered to. Technical Specification 4.11.A.1.g requires that a fire protection building hydraulic performance verification be performed tri-annually.

Contrary to the above, the requirement was not met in that Surveillance Instruction 4.11.A.1.g was inadequate to assure that reactor building hydraulic performance was as described in the fire protection system design bases, the post modification test (PT 13-1) or the Browns Ferry Fire Recovery Plan, Part X, Section A of 1976.

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

6. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with instructions, procedures, and drawings. Operating Instruction 32A (Drywell Control Air System) specified the required valve lineup for the drywell control air system. Operating Instruction 24 (Drywell Delta-Pressure Control Air Compressor System) specifies the required valve lineup for the drywell delta-pressure control air compressor system.

- a. Contrary to the above, the requirement was not met in that on April 5, 1984, drywell control air return filter bypass valve 1-32-2525 was found mispositioned in the open position. OI 32A requires the filter bypass valve to be shut for standby readiness. The master valve status checklist indicated the valve was shut which was contrary to the as-found position.
- b. Contrary to the above, the requirement was not met in the April 10, 1984, drywell delta-pressure control air compressor temperature regulatory bypass valve 2-24-876 was found mispositioned in the open position. OI 24 requires the valve to be shut. The master valve status checklist indicated the valve was shut which was contrary to the as-found position.

This is a Severity Level V violation (Supplement I) applicable to Unit 1 and 2.

Tennessee Valley Authority  
Browns Ferry 1, 2, and 3

4

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

7. 10 CFR 50, Appendix B, Criterion X requires that a program for inspection of activities affecting quality shall be established and executed to verify conformance with documented instructions, procedures, and drawings for accomplishing the activity.

Contrary to the above, the requirement was not met as related to Mechanical Maintenance Instruction (MMI) 125 (Inspection, Testing, and Maintenance of Monorail Systems, Underhung Cranes, and Overhead Hoists) and MMI 130 (Mobile Cranes and Forklifts, Inspection, Testing, and Preventative Maintenance) as indicated by the examples below.

- a. MMI 125 requires a periodic inspection of monorail systems, underhung cranes, and hand chain-powered overhead hoists to be conducted on idle (over six months) equipment. No evidence was available for review to indicate this inspection was being scheduled or completed as required.
- b. MMI 125, Appendix 2, requires a frequent (not defined) inspection be conducted on hand-powered overhead hoists. The hooks are to be checked to ascertain the hook throat opening was not more than 15% greater than normal throat opening. The procedure did not specify the normal throat opening and no evidence the inspection had even been conducted was available for review. Several mechanical engineers/technicians interviewed did not know what the normal throat opening would be for various size hooks. The procedure specifically deleted any data sheet requirements.
- c. MMI 130 requires wire rope inspections to include a check for proper rope reeving. The reeving of individual cranes was not listed in the procedure or known by mechanical craft personnel.
- d. MMI 130, data sheet 7, monthly wire rope inspection, is inconclusive on required signoffs (one yes/no signoff for two determinants, step 1.c.) and does not address a signoff for each requirement in the procedure text. (No signoff to verify rope reeving).

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

8. 10 CFR 50, Appendix B, Criterion VI requires that measures shall be established to control the issuance of documents, such as drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents are distributed to and used at the location where the prescribed activity is performed. Browns Ferry Standard Practice 2.5 implements the drawing control procedures and requirements.

Contrary to the above, the requirements of BF 2.5 were not met in that control drawing 47W847-10 in the Technical Support Center was of the wrong revision. The current revision is revision 3 where as revision 2 was found in the TSC control drawings.

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.

**MAY 23 1984**

Date: \_\_\_\_\_