official

Tennessee Valley Authority
ATTN: Mr. H. G. Parris
Manager of Power and Engineering
500A Chestnut Street Tower II
Chattanooga, TN 37401

Gentlemen:

SUBJECT: REPORT NOS. 50-259/84-20, 50-260/84-20, AND 50-296/84-20

Thank you for your response of October 15, 1984, to our Notice of Violation issued on September 13, 1984, concerning activities conducted at your Browns Ferry facility. We have evaluated your response and with the clarifications noted below, found that it meets the requirements of 10CFR 2.201. We will examine the implementation of your corrective actions during future inspections.

In discussion between Mr. R. Butcher of this office and Mr. M. Hellums and Mr. B. Morris of TVA's staff on November 13, 1984, certain clarifications were discussed as follows:

1. Response 4.D, Corrective Steps Taken to Avoid Further Noncompliance; states: "Please note that separation of manual SRVs from ADS SRVs is not being committed to, as the Appendix R modification (ECP PO822) will supersede the commitment made in Section X of 'Plan...and revision there to.'"

It is noted that TVA's response and our acceptance does not supersede previous commitments for manual SRV and ADS SRV separation criteria. TVA will be required to submit a justification for and request relief from previous commitments through the normal licensing process. Unitl written relief is obtained for the previous commitment noted above, Region II will continue to enforce those commitments.

 Response to 5.C states: ADS and HPCI Division 1 cables will be separated during the next scheduled refueling outage for each unit. The BFN design criteria for electrical separation will be issued by September 1985.

Since Unit 1 is presently scheduled for a refueling outage from March 22, 1985 through October 8, 1985 the BFN design criteria would appear to be developed too late for Unit 1. It was explained that the ADS and HPCI. Division 1 cable design criteria would be complete prior to the Unit 1 outage and the date noted was overall electrical cable separation design criteria.

 Response 3.E states: One of two stated options will be implemented for final resolution of the violation. Response 5.E., date when full compliance will be achieved did not address a final solution date.

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It was stated that a decision would be made by March 15, 1985 and the NRC would be notified within 30 days of March 15, 1985 of the corrective action and a completion date.

We appreciate your cooperation in this matter.

Sincerely,

James P. O'Reilly Regional Administrator

cc: J. A. Coffey, Browns Ferry Nuclear Plant Site Director

G. T. Jones, Plant Manager
J. W. Anderson, Manager
Office of Quality Assurance

H. N. Culver, Chief, Nuclear Safety Staff

D. L. Williams, Jr., Supervisor Licensing Section

R. E. Rogers, Project Engineer

bcc: NRC Resident Inspector Document Control Desk State of Alabama

R. J. Clark, Licensing Project

Manager

fr GPaulk: 1cs 11/15/84 RII RButcher 11/15/84

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