

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 August 25 - September 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 activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. Recirculation system Special Test Instruction (STEAR) 83-01 delineates certain requirements with respect to Unit 2 recirculation system vibration and leak detection.

Contrary to the above, the requirements of STEAR 83-01 were not met in that several procedural requirements were not satisfied. Examples of failure to adhere to STEAR 83-01 include:

- a. STEAR 83-01 requires recirculation system vibration readings be taken twice a day (once every 12 hour shift) by the Shift Technical Advisor (STA).

Contrary to this, over the reviewed period from July 4 to September 15, 1984, vibration readings for 17 days were logged as being taken only once a day and on 3 days no readings were taken at all (figure 25 of STEAR 83-01).

- b. STEAR 83-01 requires recirculation system leak detection readings be taken twice a day by the STA.

Contrary to this, over the reviewed period from July 4 to September 15, 1984, 17 leak detection readings were not logged on the required data log (figure 25 of STEAR 83-01) as being taken. In addition, on 3 days, no leak detection readings were recorded as being taken.

This is a Severity Level IV violation (Supplement 1). Applicable to Unit 2.

This violation is similar to Item A contained in a Notice of Violation sent to you in our September 21, 1983 letter (260/83-33-02).

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2. 10 CFR 50, Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality such as deficiencies and deviations are promptly identified. The measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, this requirement was not met in that the corrective steps taken in response to the previous violation of STEAR 83-01, (260/83-33-02) were not adequate to preclude repetition. A special stamp developed for the STA's log was to be used to prevent the required STEAR 83-01 log reading from being missed for the Unit 2 recirculation pipe leak detection equipment. A review of the STA log since January, 1984 revealed the special stamp had not been used and resulted in several log readings not being taken as required by STEAR 83-01.

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

3. 10 CFR 50, Appendix B, Criterion VII requires that measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents.

Contrary to the above, this requirement was not met for the following three examples of procurement:

- a. Procurement document RD 926183 specified that the nitrogen purchased should have an oxygen concentration of less than ten parts per million (ppm) but the vendor's test results showed 13 ppm oxygen. The material receipt inspection report dated January 12, 1983, approved the material as conforming to the purchase documents although this concentration exceeded the specified amount.
- b. Procurement document RD 941184 dated September 8, 1984, specified that the nitrogen purchased should have less than 3 ppm moisture content but the supplier's test results for moisture content was left blank on the report form. The material was accepted with no deficiencies noted.
- c. Procurement document RD 941015 dated June 1, 1984, specified that the hydrogen purchased should have a test report as to purity and moisture content, but the test report results for purity and moisture content was left blank on the test report form. No material receipt inspection form could be found for this item.

This is a Severity Level IV Violation (Supplement I). Applicable to all three Units.

4. 10 CFR 50, Appendix B, Criterion V requires that measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, this requirement was not met for two examples:

- a. Changes to instrument maintenance instruction, IMI-162, for calibration and functional testing of the off-gas hydrogen analyzers were not controlled and the working copy used by instrument mechanics in the field contained pages 1, 7, and 8 dated June 20, 1978 but the pages should have been dated January 3, 1979, December 27, 1979 and December 27, 1979, respectively. The instrument shop library copy contained two pages numbered eight dated January 3, 1979 and December 27, 1979. Also, posted on the Unit 2 off-gas hydrogen analyzer cabinet was page 10 dated June 20, 1978, but in the latest revision of the procedure, page 10 was dated April 11, 1984.
- b. Changes to surveillance instruction, S.I. 4.2.B-45A, dated August 8, 1984, Low Pressure Coolant Injection System Logic, were not adequately reviewed to insure the proper relay designation in step 4.1.7. This resulted in the inadvertent start of residual heat removal pump 1B in Loop 1 during the performance of S.I. 4.2.B-45A for Loop II on September 21, 1984. Relay 10A-K25A was designated but relay 10A-K25B should have been designated. Unit 1 was operating at 99% power.

This is a Severity Level V Violation (Supplement I). Applicable to all three 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: OCT 12 1984