

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 June 26 - July 27, 1984.

The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification (TS) 3.5.C.6 requires that if TS 3.5.C.2 through 3.5.C.5 are not met, an orderly shutdown shall be initiated and the unit placed in the cold shutdown condition within 24 hours. Technical Specification 3.5.C.2 requires a minimum of four operable Residual Heat Removal Service Water (RHRSW) pumps assigned to RHRSW service during reactor power operation of two units.

Contrary to the above, this requirement was not met on July 20, 1984 in that an orderly shutdown was not initiated when TS 3.5.C.2 was not met for the required number of operable residual heat removal service water pumps. Unit 1 remained at 100% power and Unit 2 at 55% power during this period.

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

2. Technical Specification 4.5.C.4 requires that when it is determined that one of the RHRSW pumps supplying standby cooling is inoperable at a time when operability is required, the operable RHRSW pump on the same header and its associated diesel generator and the Residual Heat Removal (RHR) heat exchanger header and associated essential control valves shall be demonstrated to be operable immediately. Plant Surveillance Instruction 4.5.C., RHRSW System and Emergency Equipment Cooling Water System Valve Operability Test (Common), states to perform Section 4.5.C.1 (Valve 23-57 only) to demonstrate operability.

Contrary to the above, this requirement was not met in that when the B1, B2, and D1 RHRSW pumps were declared inoperable on July 20, 1984, the associated essential control valves (valve 23-57) were not demonstrated to be operable immediately and were never tested while the pumps were inoperable. Unit 1 was operating at 100% power and unit 2 at 55% power.

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

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3. Technical Specification 3.7.E.1 requires that both Control Room Emergency Ventilation (CREV) pressurization systems and the diesel generators required for their operation shall be operable at all times when any reactor vessel contains irradiated fuel. Technical Specification 3.7.E.3 states that from and after the date that one of the CREV is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding 7 days.

Contrary to the above, this requirement was not met in that on July 25, 1984, the 'B' CREV system suction automatic damper was found disconnected. At the same time the diesel generator 'A', which supplies power to the redundant 'A' CREV system, was out of service for maintenance. Units 1 and 2 were at power during this time. The CREV 'B' system was last known to be operable during surveillance testing on July 2, 1984.

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

4. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be accomplished in accordance with prescribed procedures. Browns Ferry Standard Practice 14.25 implements the plant tag clearance procedures to be adhered to during plant operations.

Contrary to the above, the requirement was not met in that on July 9, 1984, it was found that clearance 84-412 was incorrectly placed such that the hold order tag for valve HCV 2-2-1260 (demineralized water to torus level instrumentation) was hung on the incorrect valve and not placed on HCV 2-2-1260 as required by the clearance order. Additionally, the clearance order for valve 2-2-1260 had been second party verified incorrectly such that the second party verification was not effective in noting the error.

This Severity Level IV violation (Supplement I) applicable to Unit 2.

5. 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 Standard Practice 12.20 (BF 12.20), Actions Required by Technical Specification Definition 1.C.2-LCO, was not followed and form BF 126 not checked to clarify the applicable limiting condition for operation. For example:

- a. Form BF 126 was not checked when residual heat removal service water pumps were declared inoperable on July 20, 1984, while a diesel generator was inoperable. Unit one was operating at 100% power and unit two at 55% power.

- b. A review of plant conditions and available records for the past few months revealed that form BF 126 was never completed at times when a diesel generator was declared inoperable as indicated below:

<u>Diesel Generator</u>	<u>Time</u>	<u>Date</u>
B	6:15 p.m.	6/16/84
D	5:50 a.m.	6/18/84
3EA	1:15 a.m.	6/08/84
B	11:40 p.m.	5/30/84
C	8:20 a.m.	5/28/84

A form dated November 2, 1983, for the 'C' diesel was not signed by the shift engineer or the operations supervisor as required.

This is a Severity Level IV 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 17 1984