

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

1630 Chestnut Street Tower II

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January 18, 1985

U.S. Nuclear Regulatory Commission  
Region II  
ATTN: James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

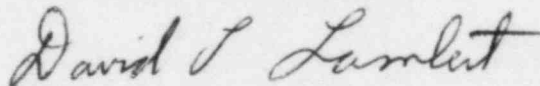
Dear Mr. O'Reilly:

Enclosed is our response to D. M. Verrelli's December 19, 1984 letter to H. G. Parris transmitting IE Inspection Report Nos. 50-259/84-48, -260/84-48, -296/84-48 for our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. If you have any questions, please call Dennis McCloud at FTS 858-2725.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



D. L. Lambert  
Nuclear Engineer

Enclosure

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RESPONSE  
NRC INSPECTION REPORT NOS.  
50-259/84-48, 50-260/84-48, AND 50-296/84-48  
DAVID M. VERRELLI'S LETTER TO H. G. PARRIS DATED  
DECEMBER 19, 1984

Enclosure 1

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

Item 1 - (50-259/260/296/84-48-01)

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, the requirement was not met in that clearances used for the protection of workmen, the public, and equipment were not accomplished in accordance with Standard Practice BF 14.25 (Clearance Procedure) in the following examples:

Example 1a

- a. Contrary to BF 14.25 which requires the position of the valve or switch to be recorded on the clearance sheet, Hold Order No. 84-2364 issued on 10/28/84 did not have the required position of the 3A Diesel Generator No.2 Air Compressor Local Control Switch recorded. Furthermore, the switch position was not recorded in the second person verification column or the return to normal and the second person verification of returned to normal columns.

1. Admission or Denial of the Alleged Violation

TVA admits the alleged violation as stated.

2. Reasons for the Violation

Lack of attention to detail was the reason for the violation.

3. Corrective Steps Which Have Been Taken and Results Achieved

Verbal contact was made with the shift engineer, and he corrected the clearance sheet.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

This event along with procedure revisions in items b, c, and d will be covered in operator supplemental training.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by June 1985 when Standard Practice BF 14.25 is revised.

Examples 1b, c, and d

- b. The general requirements of BF 14.25 state that a clearance is established by the use of protective tags placed so as to indicate the main point of control and the boundary of isolation and that protective tags shall not be applied except under established procedures. Contrary to this, a protective tag was placed on the 3A Diesel Generator No. 2 Air Compressor Local Control Switch on Hold Order No. 84-2364 issued on 10/28/84 not the the purpose of boundary isolation, but according to the operators, the tag was placed for the purpose of maintaining the switch in its normal alignment (the AUTO position). The boundary of isolation for the air compressor was established by a protective tag on the circuit breaker.
- c. Contrary to BF 14.25 which requires that the position to which the valve was placed for the clearance be recorded on the clearance sheet. Hold Order No. 84-1259 issued on 10/31/84 did not have the required position of valve FCV 74-67 recorded. According to the operators, the valve was required to be closed; however, the valve handwheel to which the protective tag was attached was not required to be in any specific position.
- d. Contrary to BF 14.25 which requires that the position to which the switch was placed for the clearance be recorded on the clearance sheet, Hold Order No. 84-1781 issued on 10/20/84 did not have the required position of Unit 3 generator breaker control switch recorded. According to plant personnel, the two-position switch (Trip/Close) is spring returned to a neutral position and was not required to be in either the open or closed position; however, a review of previous clearances issued under the same hold order showed that on six occasions the control switch was required to be in the "OFF" position and on four occasions the switch was not required to be in any specific position.

1. Admission or Denial of the Alleged Violation

TVA admits the violation as stated.

2. Reason For the Violation

Procedure inadequacy was the cause of the violation. The procedure was not written to the level of detail necessary to ensure consistency in tagging and documentation of control switches tagged for information or handwheels of motor operated valves which are not engaged to the operating mechanism.

3. Corrective Steps Which Have Been Taken and Results Achieved

Procedures are in the process of being revised to correct the deficient procedures.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

Standard Practice (BF 14.25) will be revised to provide sufficient detail that ensures consistency in tagging control switches for information and handwheels of motor operated valves.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by June 1985 when Standard Practice BF 14.25 is revised.