ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority

Browns Ferry 1, 2, and 3

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

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).

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:

- 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.
- 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 for 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.

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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 issue! 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.

This is a Severity Level V violation (Supplement I) and is applicable to Unit 2 and 3.

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: DEC 1 9 1984