TENNESSEEU ALLEY AUTHORITY CHATTANOGSA TENNESSEE 87401 400 Chestnut Street Tower II 84 OCT 12 A9: 38 October 5, 1984 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 September 10, 1984 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/84-33, -260/84-33, -296/84-33 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our response to the Notice of Violation. If you have any questions, please call Jim Domer 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 L. M. Mills, Manager Nuclear Licensing Enclosure 8411130569 841018 PDR ADDCK 05000259 PDR An Equal Opportunity Employer

RESPONSE NRC INSPECTION REPORT NOS. 50-259/84-33, 50-260/84-33, AND 50-296/84-33

Enclosure 1

(Violation 259/260/296/84-33-01)

Technical Specification 6.3.A.1 requires that detailed written procedures, including applicable checkoff lists, for the normal startup, operation, and shutdown of the reactor and of all systems and components involving nuclear safety of the facility be prepared, approved, and adhered to.

Contrary to the above, this requirement was not met in that residual heat removal (RHR) heat exchanger "B" outlet valve 2-74-33 was found not locked as required by Operating Instruction (OI) 74. A followup audit conducted by the licensee found the following valves not locked as required by plant operating instructions.

Valve Unlocked	Required by
2-67-603 RHR B Seal Heat Exchanger Throttling Valve	01-67
1-74-722 Suppression Pool Drain	OI-74
2-74-22 Heat Exchanger C Outlet	OI-74
2-74-575A Heat Exchanger A Shell Drain	OI-74
2-769 Condensate Storage Tank 4 Outlet	01-2
2-770 Condensate Storage Tank 5 Outlet	0I-2
2-766 Condensate Storage Tank 4 & 5 Tie Into Unit 3	0I-2
1-32-305B Air Compressor B Vent Bypass to Air Compressor	0I-32/32A
1-32-2520 B Suction Isolation Valve to Containment X-50	OI-32/32A

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

1. Admission or Denial of the Alleged Violation

TVA admits to the violation as stated.

2. Reasons for the Violations if Admitted

The reason for the violation is unknown, but the valves are believed to have either been inadvertently left unlocked or the locks were broken off the valve after having been in place.

3. Corrective Steps Which Have Been Taken and Results Achieved

All systems with locked valves were checked. Each shift engineer held group meetings and discussed requirements for locked valves. Requirements for maintaining locked valves are being discussed in assistant unit operator retraining classes. Full compliance was achieved when all locked valves were verified to be locked.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations (or Findings)

Locked valve checks will be performed quarterly to prevent this from happening again.

5. Date When Full Compliance Will Be Achieved

The first quarterly check will be complete by December 31, 1984.