

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

84 OCT 12 09:38

October 4, 1984

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

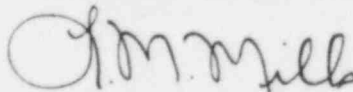
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' August 31, 1984 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/84-27, -260/84-27, -296/84-27 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. A five-day extension to October 5 was discussed between Mike Hellums of my staff and Ross Butcher of your staff on October 1, 1984. 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

8411160013 841023
PDR ADOCK 05000259
Q PDR

RESPONSE
NRC INSPECTION REPORT NOS.
50-259/84-27, 50-260/84-27, and 50-296/84-27

Enclosure 1

(Violation 259, 260, and 296/84-27-01)

The following violations were identified during an inspection conducted on August 7-10, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification Section 6.3.A.10 requires that detailed fire protection and prevention procedures be prepared, approved, and adhered to. Mechanical Maintenance Instruction (MMI) 122 implements a high pressure fire protection system flush and strainer inspection and cleaning program to assure fire protection system operability.

Contrary to the above, the strainers for a number of fire protection systems, such as the sprinkler systems for the cable spreading rooms, vital battery rooms, and intake pumping structure, were not included in procedure MMI-122 to assure that these strainers were properly flushed inspected, and cleaned under an approved procedure.

This is a Severity Level IV Violation (Supplement I) applicable to all units.

1. Admission or Denial of the Alleged Violation (or Finding)

TVA admits to the violation as stated.

2. Reasons For the Violations (or Finding) if Admitted

The fact that the strainers at the intake, control bay and an area of the turbine building did not appear in MMI-122 was an oversight.

3. Corrective Steps Which Have Been Taken and Results Achieved

MMI-122 has been revised to include the strainer locations that were left out. The revision was PORC approved on 9-21-84. These strainers were cleaned by use of maintenance requests prior to the MMI revision to ensure proper maintenance.

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

No further action is planned at this time.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on 9-21-84 when MMI-122 was revised.

Enclosure 1

(Violation 259, 260, and 296/84-27-03)

2. Technical Specification Section 6.3.A.10 requires that detailed fire protection and prevention procedures be prepared, approved, and adhered to. Standard Practice Procedure BF-14.47, Fire Training, implements the fire brigade member qualification and training requirements.

Contrary to the above, the fire brigade qualification and training requirements were not met in that:

- a. All fire brigade leaders and members had not received a medical evaluation for performing strenuous activities within the past 12 months as required by Procedure 14.47.
- b. All brigade members had not participated in regular planned meetings every three months to review the basic concepts of the initial fire brigade training course as required by Procedure BF-14.47.

This is a Severity Level IV Violation (Supplement I) applicable to all units.

1. Admission or Denial of the Alleged Violation (or Finding)

TVA admits to the violation as stated.

2. Reasons For the Violations (or Finding) if Admitted

Browns Ferry's interpretation of the requirements were not consistent with NRC's, and the requirements are not specifically clear as to the intent. Item a was taken to mean during a calendar year rather than every 12 months. Item b had been interpreted by the NCO as being able to miss 2 classes before becoming delinquent rather than NRC's of missing no classes.

3. Corrective Steps Which Have Been Taken and Results Achieved

Plant Standard Practice BF-14.47 is being revised to clarify and eliminate any future misinterpretations.

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

All Standard Practices relating to fire protection will be revised for any similar conditions. The Standard Practice will be revised to require attendance of six out of eight classes during a two-year training cycle, as discussed with Bill Miller of your staff.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by January 1, 1985.