

ENCLOSURE

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 April 1-4, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed and performed through documented procedures and instructions which include criteria to determine that important activities are satisfactorily accomplished.

Contrary to the above, TVA has not prescribed or performed certain activities affecting quality through documented procedures and instructions which included criteria to assure they were satisfactorily accomplished. Specific examples are as follows:

- a. Instructions provided for the inspection of check valves in the emergency equipment cooling water system for the diesel generators did not contain inspection requirements nor acceptance criteria.
- b. Documentation of initial inspection results for eight valves, could not be retrieved in two cases (four valves each); in the remaining six cases, the inspection instructions did not require inspection for excessive wear or crud buildup.
- c. Documentation of initial inspection results for two of the inspections, MR A-271179 and -271180, incorrectly identified the piping system.

This is a Severity Level IV Violation (Supplement I).

2. 10 CFR 50, Appendix B, Introduction and Criterion II, as implemented by TVA Topical Report TVA-TR75-1A, Rev. 8, require that TVA identify the components to which their Quality Assurance (QA) program applies and that the components identified must include all of those which mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public.

10 CFR 50, Appendix B, Criterion XVI, as implemented by Topical Report TVA-TR75-1A, requires the licensee to assure prompt correction of deficiencies.

Contrary to the above, TVA did not correctly identify all of the components to which its QA program should apply and after identification of this deficiency, it was not promptly corrected, in that:

- a. TVA's listing of components to which their QA program applies omits the portion of their emergency equipment cooling water system outside of their secondary containment. As a consequence, components needed to assure that emergency diesel generators are cooled sufficiently to function are not included in the written program. These components are required to mitigate postulated accidents that could cause undue risk to the health and safety of the public. The list is given in the Browns Ferry Final Safety Analysis Report (FSAR), the TVA Operational Quality Assurance Manual, and Browns Ferry Standard Practice BF 1.11. The NRC approved QA program document references the FSAR list.
- b. TVA was informed of the omission during NRC Inspection 259, 260, 296/84-47, completed November 16, 1984. Over four months later on April 4, 1985, TVA still had not corrected their list.

This is a Severity Level IV violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion XVII, as implemented by TVA Topical Report TVA-TR75-1A, requires that records of activities affecting quality be retrievable.

Records for activities affecting quality were not retrievable in that inspection records for inspections of check valves to DG Coolers D and 3A, reportedly recorded on MRs A-261126 and A-260352, could not be retrieved. The subject inspection records were for inspections conducted in response to IEB-83-03.

This is a Severity Level V violation (Supplement I).

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.

MAY 13 1985

Date: \_\_\_\_\_