

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry Units 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 February 26 - March 25, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification 3.7.B.1 requires that all three trains of the Stand-by Gas Treatment (SBGT) System be operable at all times when secondary containment integrity is required except one train may be out of service for seven days as specified in 3.7.B.3.

Contrary to the above, this requirement was not met in that during a routine tour of the normally locked SBGT room on March 8, 1985, the 480-volt circuit breaker (2A) for the humidity control heater of SBGT "C" train was found in the tripped condition making the "C" train inoperable. Indication of this condition existed at the back panel of Unit 2 control room where both the "OFF" (green) and "ON" (red) indicating lights for the humidity control heaters were not illuminated and a maintenance request sticker was still in place next to the indicating lights for a previously cleared maintenance request, M.R. A-312188, for troubleshooting a previous problem with the heater breaker on October 6, 1984. The circuit breaker was replaced and the train returned to service on March 9, 1985.

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

2. Technical Specification 6.3.A.6 requires that detailed written procedures covering surveillance and testing requirements be prepared and adhered to.

Contrary to the above, Surveillance Instruction 2 (SI-2), "Instrument Checks and Observations," was not adhered to on March 5, 1985 in that the comparison of reactor water level instrument readings required by Section 2.1 was not performed on the Units 1 or 2 level instruments. Section 2.1 of SI-2 implements the daily reactor water level instrument checks required by Technical Specifications 4.2.A, 4.2.B, and 4.2.F. An instrument check is defined in Technical Specification 1.V.4 as a qualitative determination of operability by observation of instrument behavior during operation. This determination shall include, where possible, comparison of the instrument with other independent instruments measuring the same variable.

Contrary to the above, SI-2, "Instrument Checks and Observations," was inadequately written such that it did not fully implement the Technical Specification surveillance requirements. Technical Specifications 4.2.A, 4.2.B, and 4.2.F require daily reactor water level instrument checks consisting of a comparison with other independent instruments where possible. Section 2.1 of SI-2 implements this requirement; however, it erroneously requires comparison of instruments which are not independent in that they share common sensing lines even though independent level instruments were available for comparison. SI-2 was additionally inadequate in that it did not include appropriate quantitative or qualitative acceptance criteria for determining what constitutes a satisfactory comparison of independent reactor water level instruments.

Contrary to the above, the licensee failed to adhere to Surveillance Instruction 4.2.B-4, "Instrumentation that Initiate or Control the Core Standby Cooling Systems (CSCS) - Drywell High Pressure (PS-64-58-E-H)," on March 14, 1985 in that:

- a. The pneumatic calibrator was not connected to the test tee as specified in Step 4.3 but was instead connected to a fitting which was disconnected in the instrument drain tubing.
- b. Pressure was not decreased below 1.2 psi as required in Step 4.5 but was instead decreased until the applicable relay dropped out at about 1.7 psi.

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

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: APR 24 1985