

TENNESSEE VALLEY AUTHORITY

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JUL 06 1988

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

In the Matter of	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
	)	50-296

BROWNS FERRY NUCLEAR PLANT (BFN) UNITS 1, 2, AND 3 - NRC INSPECTION REPORT NOS. 50-259/88-10, 50-260/88-10, AND 50-296/88-10, - RESPONSE TO NOTICE OF VIOLATION

This letter provides TVA's response to the letter from K. P. Barr to S. A. White dated June 3, 1988, which transmitted the subject report citing TVA with a violation in the area of procedural guidance for the preparation of licensing submittals.

As described in the enclosure to this letter, TVA denies the violation on the basis that TVA's procedures provide sufficient guidance to ensure proper authorization for releasing licensing information to NRC.

If you have any questions, please telephone Carroll McFall at (205) 729-2046.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley, Director  
Nuclear Licensing and  
Regulatory Affairs

Enclosure  
cc: See page 2

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U.S. Nuclear Regulatory Commission

JUL 06 1988

cc (Enclosure):

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## ENCLOSURE

RESPONSE TO NRC INSPECTION REPORT  
NOS. 50-259/88-10, 50-260/88-10, AND 50-296/88-10  
LETTER FROM K. P. BARR TO S. A. WHITE  
DATED JUNE 3, 1988

### Violation

Technical specifications 6.8.1.1.a and 6.8.1.1.j require the licensee to establish, implement, and maintain administrative procedures which control technical and cross-disciplinary review. Implicit in this requirement is that the procedures be adequate for the activity involved.

Administrative procedure PMP 0602.01, Management of TVA's Interface with the Nuclear Regulatory Commission, addresses the licensee's responsibilities and requirements for the preparation of licensing submittals.

Contrary to the above, administrative procedure PMP 0602.01 was found to be inadequate in that it lacked any requirement or guidance on the use of tentative or draft information in preparation of licensing submittals. This deficiency contributed to the licensee's submittal of draft information for NRC review on March 23, 1988. The licensee's calculations used to evaluate the effects of a postulated fuel drop accident did not receive full independent verification nor approval for issuance until two days after issuance of the submittal.

### TVA Response

#### 1. Admission or Denial of the Violation

TVA denies the violation as stated.

#### 2. Reasons for the Denial of the Violation

PMP 0602.01 establishes the review and approval process for communications with NRC. The procedure requires that information submitted to the NRC be technically correct and approved by management for release. The calculations which supported the March 23, 1988 submittal had been prepared more than a week before the transmittal to NRC. Sufficient checking and design verification had been done to ensure technical adequacy. The signatures which had not been obtained as of the submittal date were those associated with minor verification checks and final administrative review. The calculation results were released through a Quality Information Release (QIR), which provides for an appropriate technical and management review. Formal issuance of the calculations was completed on March 25. Thus, by virtue of the technical information being released in accordance with TVA procedures and its having appropriate technical and management review before being submitted to NRC, TVA considers that the requirements of PMP 0602.01 were met. Furthermore, this procedure adequately ensures the proper management approval and technical accuracy of information provided to NRC.

TVA also takes exception to the violation with respect to the quoted technical specification provisions. Technical specification 6.8.1.1.a is the implementing clause for procedures referenced in Appendix A to Regulatory Guide 1.33, Revision 2, which applies to procedures for typical safety-related activities associated with an operating nuclear power plant. PMP 0602.01, which provides guidelines for TVA's interface with NRC, is clearly outside the scope of activities that must be covered by written procedures under this regulatory guide.

Technical specification 6.8.1.1.j was approved as part of a recent general revision to the administrative section of the technical specifications and requires that administrative procedures be maintained which control the technical and cross-disciplinary review of other plant procedures. Our review indicates PMP 0602.01 does not fit into this category of procedures. Rather, PMP 0602.01 implements TVA Office of Nuclear Power policy with respect to the interface of TVA and NRC on nuclear licensing matters. This distinction is substantiated by the NRC Safety Evaluation Report (SER) for the subject technical specification change dated September 11, 1987. In section 2.9 of the SER, NRC recognized the role the Plant Operations Review Committee would have in reviewing administrative procedures for the control of the technical and cross-disciplinary review of plant specific written procedures. Based on the above, TVA does not consider that either technical specification 6.8.1.1.a or 6.8.1.1.j was violated.

In summary, the calculation results submitted to the NRC were accurate and received an appropriate level of technical and management review. PMP 0602.01 provides sufficient guidance to ensure proper authorization for release of licensing information. Additionally, the referenced technical specifications were not violated.