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September 6, 1988

Docket Nos. 50-259, 50-260, 50-296 License Nos. DPR-33, DPR-52, DPR-68

Mr. S. A. White Senior Vice President, Nuclear Power Yennessee Valley Arthority SN 38A Looisut Place 1103 Market Streat Listennoga, TN 37402-2801

Dei Mr. Koite:

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SUBJECT: REPORT NOS. 50-259/88-10, 50-260/88-10, AND 50-296/88-10

Thark you for your response of July 6, 1988, to our Notice of Violation issued on June 3, 1988, concerning activities conducted at your Browns Ferry facility. We have evaluated your response and found that it meets the requirements of 10 CFR 2.201.

Based on the information provided in your response, we accept your denial of the violation and will delete it from our records. However, we disagree with your statement on page 2 of the Enclosure to your response that an administrative procedure such as "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." Regulatory Guide 1.33, Revision 2, Section C.1 states, "Appendix A lists typical safety-related activities that should be covered by written procedures, but does not provide a complete listing of needed procedures." It is our position that your administrative procedures that control the transmittal of data and information needed by the NRC to evaluate the safe operation of safety systems and your nuclear plant are clearly safety-related and must be covered by written procedures addressed by Regulatory Guide 1.33, and Technical Specification 6.8.1.1.a commits you to this position.

We appreciate your cooperation in this matter.

Sincerely,

B.D. Liaw for

Strven D Richardson, Director TVA Projects Division Office of Special Projects

cc: (See page 2)

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Mr. S. A. White

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