

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
5N 157B Lookout Place

MAY 23 1988

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

Gentlemen:

In the Matter of  
Tennessee Valley Authority

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)

Docket Nos. 50-259  
50-260  
50-296

BROWNS FERRY NUCLEAR PLANT (BFN) UNITS 1, 2, AND 3 - NRC INSPECTION REPORT  
NOS. 50-259/88-06, 50-260/88-06, AND 50-296/88-06, - RESPONSE TO NOTICE OF  
VIOLATION

This letter is to provide TVA's response to your letter from K. P. Barr to  
S. A. White dated April 20, 1988, which transmitted the subject report. The  
report cited TVA with one violation.

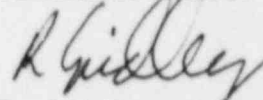
During a followup inspection, from May 6 through May 10, the NRC inspector  
noted that appropriate corrective actions had been implemented to preclude  
further violations of this type.

Enclosure 1 provides background information and TVA's response to NRC concerns  
raised in the subject report. A list of commitments is provided in  
enclosure 2.

If you have any questions, please telephone Clark Madden at (205) 729-2049.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Director  
Nuclear Licensing and  
Regulatory Affairs

Enclosures  
cc: See page 2

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U.S. Nuclear Regulatory Commission

**MAY 23 1988**

cc (Enclosures):

Mr. K. P. Barr, Acting Assistant Director  
for Inspection Programs  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
Region II  
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Atlanta, Georgia 30323

Mr. G. G. Zech, Assistant Director  
for Projects  
TVA Projects Division  
U.S. Nuclear Regulatory Commission  
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11555 Rockville Pike  
Rockville, Maryland 20852

Browns Ferry Resident Inspector  
Browns Ferry Nuclear Plant  
Route 12, Box 637  
Athens, Alabama 35611

ENCLOSURE 1

RESPONSE  
NRC INSPECTION REPORT  
NOS. 50-259/88-06, 50-260/88-06, AND 50-296/88-06  
LETTER FROM K. P. BARR TO S. A. WHITE  
DATED APRIL 20, 1988

VIOLATION

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings--and shall be accomplished in accordance with these instructions, procedures, or drawings. Paragraph 5.2.3 of TVA's Standard Practice 7.8, Revision 2, entitled "Prevention of Foreign Material in the Reactor Vessel Cavity or Torus" states the following:

- Unnecessarily loose material will not be allowed within the control zone.
- Accountability will be maintained of all tools and material, and material or accessories on equipment capable of being introduced into the pool or cavity.
- Any activity that could result in the dropping of an item into the reactor pressure vessel will be observed by a person not involved with the activity. This person will verify that any item that could drop into the reactor pressure vessel is tied off with a lanyard, or suitable catch containers are used where it is impossible or impractical to secure items.
- All equipment used in the vessel will be verified complete with no undocumented pieces of the equipment missing when the equipment is put into the vessel.

Contrary to above on March 17, 1988, the following procedure violations were observed.

- Loose rivets were found on the refueling floor within the control zone and were mistakenly thought to have entered the reactor vessel during a lost item recovery operation.
- Accountability records did not identify what screws or parts were missing on the ultrasonic (UT) scanner used in the vessel.
- Several screws on the UT scanner were intentionally loosened rather than correct a geometric deficiency.
- Screws on the UT scanner were not attached with a lanyard or locking device.

ENCLOSURE 1

RESPONSE  
NRC INSPECTION REPORT  
NOS. 50-259/88-06, 50-260/88-06, AND 50-296/88-06  
LETTER FROM K. P. BARR TO S. A. WHITE  
DATED APRIL 20, 1988

VIOLATION

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings--and shall be accomplished in accordance with these instructions, procedures, or drawings. Paragraph 5.2.3 of TVA's Standard Practice 7.8, Revision 2, entitled "Prevention of Foreign Material in the Reactor Vessel Cavity or Torus" states the following:

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Contrary to above on March 17, 1988, the following procedure violations were observed.

- Loose rivets were found on the refueling floor within the control zone and were mistakenly thought to have entered the reactor vessel during a lost item recovery operation.
- Accountability records did not identify what screws or parts were missing on the ultrasonic (UT) scanner used in the vessel.
- Several screws on the UT scanner were intentionally loosened rather than correct a geometric deficiency.
- Screws on the UT scanner were not attached with a lanyard or locking device.

- The UT scanner was inserted and removed from the vessel several times to trouble shoot and repair scanner problems. However, the missing screws and roll pin were never identified, even after a lost item recovery occurrence where this scanner was suspected of having lost the parts observed in the vessel cavity and inspection of the scanner device was suppose to have been thoroughly performed. No one verified or accounted for any of the missing screws or the roll pin.

This is a Severity Level IV violation.

TVA's Response

1. Admission or Denial of the Alleged Violation

TVA admits to the violation as stated.

2. Reasons for the Violation

Inadequate supervision of the contractor activities and failure to ensure strict compliance with procedures, specifically Standard Practice BF-7.8, "Prevention of Foreign Material in the Reactor Vessel Cavity and Torus" were the root causes of this violation. General Electric test equipment was allowed to be placed in the reactor vessel without proper securing provisions and accountability records.

3. Corrective Steps Which Have Been Taken and Results Achieved

While performing the examination, TVA noticed that the video monitor indicated two foreign objects on the shroud support access cover plate. Refuel floor activity was stopped while recovery plan for the article was developed in accordance with Standard Practice BF-7.7. The foreign articles were retrieved from the reactor vessel.

When contractors are assigned work on the refuel floor, BFN management now ensures they clearly understand our work controls and procedures. For refuel floor or in-vessel work, consideration will continue to be given to having an engineer or operations supervisory personnel in charge or acting as an independent monitor. The appropriate supervisor will continue to ensure control zone monitoring personnel are properly trained and in place to help prevent uncontrolled material from entering the reactor vessel cavity and torus. A loose item log will be maintained, documenting control and accountability.

Please note that Standard Practice BF 7.8 was changed to Plant Manager's Instruction (PMI 7.2), "Prevention of Foreign Material in the Reactor Vessel Cavity and Torus."

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

None

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

ENCLOSURE 2

RESPONSE  
NRC INSPECTION REPORT  
NOS. 50-259/88-06, 50-260/88-06, AND 50-296/88-06  
LETTER FROM K. P. BARR TO S. A. WHITE  
DATED APRIL 20, 1988

LIST OF COMMITMENTS

1. A recovery plan for the articles was developed in accordance with Standard Practice BF-7.7. The foreign articles were retrieved from the reactor vessel. (Complete)
2. The appropriate supervisor will continue to ensure control zone monitoring personnel are properly trained and in place to help prevent uncontrolled material from entering the reactor vessel cavity and torus. A loose item log will be maintained documenting control and accountability. (Complete.)