

ENCLOSURE 1
NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2, and 3

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 1 - June 11, 1988, several examples of a violation of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C the violations are listed below:

A. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

1. During the inspection immediately following the November 2, 1987, drywell fire, the following instances in which instructions and procedures were not adhered to for work activities were identified:

a) Plant Managers Instruction (PMI) 8.1, Temporary Alterations, requires that long term alterations shall be controlled using a temporary alteration control form (TACF) in lieu of other mechanisms, such as a maintenance request (MR), which are only for short term alterations.

Contrary to the above, a TACF was not used to authorize temporary connections through penetration EE for recirculation system valve controls and drywell blower controls performed under MRs A793993 and A775468. These MRs were performed in May and October 1987, and should have been considered long term alterations.

b) NQAM Part III, Section 4.1 requires that QA Records shall have all blanks filled in or marked N/A.

Contrary to the above, MRs were found with signatures and data missing including MR A775468 which was missing signature's for "Raychem Acceptable" on 6 pages and signatures for "QC Verification of Standard Test 1" on 5 pages; and MR A822017 which was missing an entry on blocks 26 through 28 which should have documented work performed and the cause of failure.

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- c) PMI 6.2, Conduct of Maintenance, Section 4.4.13, requires that post-maintenance testing be performed on all plant process equipment following all corrective maintenance, and some preventive maintenance and troubleshooting activities that might have impaired proper functioning of the component.

Contrary to the above, no electrical checks of any nature were performed as post-maintenance testing following completion of the temporary electrical splices installed under MRs 793993 and 775468; and Electrical Maintenance Instruction (EMI) 7.2, test procedure for Initial Installation and Troubleshooting of Molded Case Circuit Breakers, failed to test the motor starter portion of the breakers. The starters contain the thermal overload elements which perform a necessary function for some modes of end-device failures.

- d) The Browns Ferry Fire Protection Program Plan (FPP-1) requires that fire brigade members be qualified to the training and qualification requirements contained therein.

Contrary to the above, three of the six fire brigade members who entered the drywell for fire fighting operations were not qualified for fire brigade duty in accordance with FPP-1. Additionally, 67 of 127 fire brigade members assigned to five operating crews were ineligible for fire brigade duty in accordance with FPP-1.

2. During this inspection the following instances of failure to follow procedures were identified:

- a) The licensee's Nuclear Quality Assurance Manual (NQAM), Part III, Section 4.1, Quality Assurance Records, requires that QA records be prepared in black ink, have all blanks filled in or marked not applicable (N/A), and that corrections be made by the single line through, initial and date method. BFEP, PI 87-52, Development and Control of the Browns Ferry Unit 2 Phase I Q-List, Step 5.7.3 requires that QEDP's shall be controlled as QA records.

Contrary to the above, the Q-List Equipment Data Package (QEDP) for System 001, Main Steam, contained information in the Tabs entitled B1/Analyses Component Pickoff and the B1/B2 Analyses Component Pickoff which did not comply with the NQAM. Specifically, there were numerous entries made in red and light blue ink, most reviewer blocks did not contain a signature or N/A, and most corrections were made without the dated initials of the person who made the correction.

- b) Site Director Standard Practice 3.7, Corrective Action, requires that a management reviewer identify, based on operability criteria in attachment 5 of the procedure, if operability at a nuclear plant could potentially be affected by a condition adverse to quality. SDSP 3.7 further requires that the responsible organization determine the significance of the CAQ in accordance with specified criteria in paragraph 4.12.

Contrary to the above, inadequate management and organization reviews of CAQR BFF870180 were performed when it was found that the Standby Gas Treatment Building original designed seismic response was underpredicted. The operability determination was made that no unit operability was affected and the fact that General Design Criterion 2 of 10 CFR 50, Appendix A was violated was not evaluated as being significant.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to the U. S. Nuclear Regulatory Commission, Attn: Document Control Desk, Washington, DC 20555 with a copy to the Director, Office of Special Projects, and a copy to the NRC Resident Inspector, Browns Ferry, within 30 days of the date of the letter transmitting this Notice a written statement or explanation in reply including: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION



Frank R. McCoy, Assistant Director
for TVA Inspection Programs
TVA Projects Division
Office of Special Projects

Dated at Atlanta, Georgia
this 22nd day of September 1988