

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2, and 3

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

During the Nuclear Regulatory Commission (NRC) inspection conducted on March 1-31, 1988, five violations of NRC requirements were identified. The violations involved: (1) failure to adhere to Technical Specification (TS) administrative controls involving the Plant Operations Review Committee (PORC) activities; PORC meetings per Technical Specification and (2) failure to properly verify, by inspection, the proper performance of a maintenance activity; (3) failure to provide required retraining in the areas of QA/QC and regulatory compliance for craft personnel and foreman; (4) failure to comply with procedural requirements for testing charcoal from the Standby Gas Treatment system and initiating LREDS; and (5) failure to properly control revisions to Temporary Alteration Control Forms (TACFs).

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. TS 6.5.1. addresses the requirements for PORC functions.

TS 6.5.1.2.a. requires the following composition.

Chairman:	Plant Manager
Alternate Chairman:	Assistant to Plant Manager
Alternate Chairman or Member:	Technical Services Superintendent
Member:	Unit Superintendents (3)
Member:	Maintenance Superintendent
Member:	Quality Assurance Supervisor
Member:	Health Physics Supervisor

TS 6.5.1.2.b. states that all alternate chairmen and alternate members shall be appointed in writing by the PORC chairman.

TS 6.5.1.8 requires PORC to maintain written minutes of each meeting including expedited meetings.

Contrary to the above, the requirements were not met as follows:

1. The acting Maintenance Superintendent who is not authorized by Plant Managers Instruction (PMI) 7.1, Plant Operations Review Committee, to be an alternate chairman, chaired a PORC meeting on March 10, 1988. Also, during the same PORC meeting, an individual acted as an alternate member for the Health Physics Supervisor without being appointed in writing in PMI 7.1.

2. Written minutes of the expedited PORC meeting conducted on March 10, 1988, in which a deficient condition with the Reactor Building overhead crane was discussed were not maintained.

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

- B. 10 CFR 50, Appendix B, Criterion X requires that a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. Browns Ferry Standard Practice 3.2, Quality Control Inspection Program, implements this criterion in section 5.2.1 which states that one of the examples of an activity that should be verified by using QA inspection hold points is satisfactory operation of valves following maintenance.

Contrary to the above, the requirement was not met on November 20, 1987 when a check valve in the Emergency Equipment Cooling Water System (EECW) was improperly installed during the performance of Maintenance Request (MR) number 792717. The valve was found to be installed backwards on March 15, 1988. Work instructions of the MR explicitly stated to re-install the valve in the proper orientation. No inspection was performed and documented to verify proper orientation of the check valve following the maintenance activity. Reversal of this check valve prevented the supply of EECW to the Residual Heat Removal (RHR) pump seal cooler and the RHR pump room cooler from the north EECW header.

This is a Severity Level IV Violation (Supplement I) and is applicable to Unit 2 only.

- C. Technical Specification 6.4 requires the retraining and replacement program for station personnel to be in accordance with ANSI-N18.1-1971, Selection and Training of Nuclear Plant Personnel. Per Section 5 of ANSI-N18.1-1971 the licensee is required to maintain a training program for replacement personnel and for retraining necessary to ensure that personnel remain proficient. This includes General Employee Training (GET).

Item 1.7 of procedure BFPMI-4.3, Specialized Training, specifies regulatory compliance training for all employees. The training frequency is annual for foremen and every two years for all others. GET 4.0, Introduction to QA/QC, is required to be taken by the employees every two years per procedure PMP 0.202.04.

Contrary to the above, the requirements were not met in that, out of twelve (12) craft personnel arbitrarily selected, the inspector found four foremen and one craft person delinquent in receiving regulatory compliance retraining, and three craft people delinquent in receiving GET 4 retraining. For some of the people, the retraining delinquency was greater than

one year. Regulatory compliance training was instituted in response to the Regulatory Performance Improvement Program.

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

- D. 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.
1. Contrary to the above, the requirements of Surveillance Instruction O-SI-4.7.B.6, Standby Gas Treatment System Iodine Removal Efficiency were not adhered to for the test on Trains B and C completed on January 12, 1988, and Train A completed on February 16, 1988. Attachment 5 of SI 4.7.B.6 requires that the charcoal samples be tested in accordance with ASTM D3803, Standard Test Method for Radioiodine Testing of Nuclear-Grade Gas-Phase Adsorbents. ASTM D3803 requires that the feed period duration and the elution period duration be 60 minutes and 240 minutes respectively. Test data contained in the completed SI data package document that the actual feed duration was 90 minutes (thirty minutes longer than specified) and the actual elution time was 90 minutes (150 minutes shorter than specified). This is similar to the violation cited in Inspection Report Numbers 50-259, 260, 296/86-11.
 2. Contrary to the above, the requirements of Plant Managers Instruction 15.4 (Unique Reporting Requirements) were not adhered to in that the Licensee Reportable Event Determination evaluation was not initiated as required to determine the operability of the Unit 2 Residual Heat Removal System lower containment spray header after an inspection (CAQR BFP880052) revealed clogged nozzles due to rust on February 3, 1988.

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

- E. 10 CFR 50, Appendix B, Criterion VI requires that measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto. These measures shall assure that documents, including changes, are reviewed for adequacy, approved for release, and properly distributed.

Contrary to the above, Revision 1 to Temporary Alteration Control Form (TACF) number 3-88-001-111 was not properly reviewed for adequacy, approved for release, and properly distributed. The original TACF was initiated on March 10, 1988 with the majority of the review and approval authorizations obtained on March 13, 1988. A revision was initiated on March 15, 1988; however, not all of the approval signatures were updated to reflect approval of the revised information in that:

1. The Operations Supervisor's concurrence signature was dated March 13, 1988.

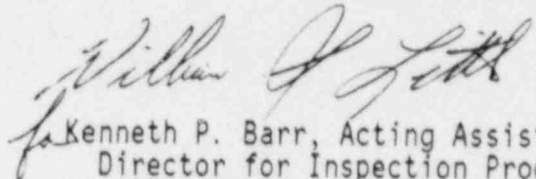
2. The shift Engineer's approval of the TACF was dated March 13, 1988.
3. The File Clerk made and distributed copies of the TACF on March 15, 1988, although four signatures on the TACF were dated March 16, 1988.

The above information was the only available on the original TACF form maintained in the Shift Engineer's office and was the condition of the TACF on March 17, 1988. Similar problems were found with the following TACF's: 2-85-50-24, 2-84-097-57, 2-84-101-64, and 2-85-039-064.

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

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation 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. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) 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


for Kenneth P. Barr, Acting Assistant
Director for Inspection Programs
TVA Projects Division
Office of Special Projects

Dated at Atlanta, Georgia
this 20th day of May 1988