



UNITED STATES
NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA ST., N.W.
 ATLANTA, GEORGIA 30323

Report Nos.: 50-259/88-22, 50-260/88-22, and 50-296/88-22

Licensee: Tennessee Valley Authority
 6N 38A Lookout Place
 1101 Market Street
 Chattanooga, TN 37402-2801

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

Facility Name: Browns Ferry 1, 2, and 3

Inspection Conducted: July 11-15, 1988

Inspectors: *K. Jensen* 9/19/88
 K. Jensen, Senior Resident Inspector Date Signed

K. Poertner 9/19/88
 K. Poertner, Resident Inspector Date Signed

Approved by: *W. S. Little* 9/19/88
 W. S. Little, Section Chief Date Signed
 TVA Projects Section 2
 TVA Projects Division

SUMMARY

Scope: This special unannounced inspection was conducted to assess the New Employee Concerns Program.

Results: One violation was identified involving inadequate corrective action in the area of operator qualifications, and is a refuel item.

50-259,260,296/88-22-01: Inadequate Corrective Action

In addition, the Brown's Ferry New Employee Concerns Program appears to be adequately implemented and administered, and is acceptable to support the restart of Browns Ferry Unit 2.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *J. Walker, Plant Manager
- *C. Ellwege, Employee Concerns Program
- *J. Looney, Employee Concerns Program
- *P. Heck, Employee Concerns Task Group
- *D. Hosmer, Restart Test Program
- *N. McFall, Compliance Staff
- *R. Baron, Quality Assurance Supervisor

NRC Personnel

- *D. Carpenter, Senior Resident Inspector
- *C. Brooks, Resident Inspector
- *E. Christnot, Resident Inspector
- *W. Bearden, Resident Inspector

*Attended exit interview on July 15, 1988.

2. Employee Concerns Program

a. Program Review

The inspectors reviewed the New Employee Concerns Program (ECP) and the Employee Concerns Task Group (ECTG) Program (old program). The new ECP is a commitment in the TVA Corporate Nuclear Performance Plan (CNPP) and is described in the TVA Employee Concern Program Instructions Manual. This ECP manual is supported by six instructions which were reviewed by the inspectors and are listed below:

- ECP 1, Site Representative Procedure
- ECP 2, Reserved
- ECP 3, File Storage
- ECP 4, Identification of Employee Concerns that are potential restart items at Sequoyah
- ECP 5, Corrective Action Verification (ECTG)
- ECP 6, Identification of Employee Concerns that are potential restart items at Browns Ferry.
- ECP 7, (Draft) ECP Corrective Action

The inspectors verified that the ECP concerns were reviewed for restart/non-restart determination for Browns Ferry Unit 2 in accordance with the criteria outlined in the CNPP.

The inspectors identified two programmatic issues which did not appear to be at the same state of completion that was required to support the restart of Sequoyah Unit 2. These issues were the piece parts program (especially the operability lookback determination) and vendor manual/drawing control program.

Based on the review of the New Employee Concerns Program manual and its supporting procedures, the inspectors considered the New Employee Concerns Program to be adequately established at Browns Ferry.

b. Implementation

The inspectors conducted an implementation evaluation and reviewed the following ECP concerns and files:

| | | |
|---------------|---------------|---------------|
| ECP-87-BF-F09 | ECP-87-BF-112 | ECP-87-BF-K46 |
| ECP-87-BF-062 | ECP-87-BF-369 | ECP-88-BF-274 |
| ECP-88-BF-801 | ECP-88-BF-495 | ECP-88-BF-200 |
| ECP-88-BF-868 | ECP-86-BF-541 | ECP-87-BF-094 |
| ECP-87-BF-H30 | ECP-87-BF-598 | ECP-86-BF-564 |
| ECP-86-BF-239 | ECP-86-BF-214 | ECP-86-BF-C67 |
| ECP-86-BF-214 | ECP-86-BF-157 | ECP-86-BF-B83 |

One instance was identified where a file did not adequately address the employee's concern as stated. In discussions with the ECP Manager, it was agreed that the file would be reopened to better address closure of the concern.

The inspectors concluded that the ECP appears to be adequately staffed, managed, and implemented, and can support the restart of Unit 2.

c. Review of ECP Subcategory Reports

The inspectors reviewed portions of the following ECTG Subcategory Reports:

- (1) 31000, Operations/operational. Element 31003 included Corrective Action Tracking Document (CATD) item QP 31003-BFH-01. As a corrective action to the CATD, standard practice BF 14.25, Clearance Procedure, was revised to require that tygon tubing utilized for temporary level indication be controlled by a caution order due to the potential for overpressurization which would result in tubing rupture. The inspector determined that this item had been closed on the licensee's tracking document and by the ECP reviewer. Review of BF 14.25 determined that the revision to the procedure did not satisfy the requirements of the CATD. The procedure was revised to alert maintenance to use caution when utilizing tygon tubing for temporary level indication. The CATD problem description stated the reason for

the CATD was a lack of administrative controls on root valves to tygon tubing being used for level control. This item was referred to the licensee for review.

- (2) 30100, Mechanical Equipment Reliability. No deficiencies were identified.
- (3) 30200, Electrical and Communications. No deficiencies were identified.
- (4) 30700, Nuclear Power Site Program. No deficiencies were identified.

This program will require additional inspection to determine adequate implementation of CATD items. In addition, inspection of the review packages that generated the CATD items will be necessary in order to determine if CATD closure adequately addressed the employee concern and programmatic concerns. The inspectors were unable to determine if this program is adequate to support the startup of Browns Ferry Unit 2. Further inspection of the ECTG Program as it applies to Browns Ferry will be conducted prior to Unit 2 startup.

3. Operator Qualifications

During this inspection, the inspectors became aware of an issue involving the training status of several Shift Engineers (four temporarily promoted and four permanently promoted). Four Assistant Shift Engineers were promoted to the position of Shift Engineer in order to support site manning requirements.

Nuclear Quality Assurance Manual (NQAM), Part II, Section 6.1, requires that shift engineers satisfy the minimum qualifications delineated in Nuclear Plant Operator Training Program procedure PMP 0202.05 at the time of initial core loading or appointment to the active position. PMP 0202.05 requires candidates for the position of Shift Engineer to pass the Shift Engineer accrediting examination unless it is waived by the Chief, Operator Training Branch, and the Plant Training Review Board or the Accrediting Subcommittee. Final Safety Analysis Report (FSAR), section 13.2.1.2.5, states that the shift engineers are qualified for their supervisory positions by fulfilling the requirements of TVA's formal operator training program. This is a comprehensive work-study training and advancement program with rigorous qualifying examinations administered by a central accrediting committee.

In approximately January 1987, the licensee's line management became aware that the four temporarily promoted Shift Engineers did not meet the above standards and did not take adequate corrective actions to resolve the issue. In addition, it was identified that four other permanently assigned Shift Engineers did not have records to show that their certification examinations were successfully passed. The licensee had not taken adequate corrective action at the time of this inspection; therefore, this is identified as a violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action (259,260,296/88-22-01).

4. Action on Previous Inspection Findings (92701)

(Closed) Unresolved Item 259,260,296/87-30-03, Lack of Formalized Methods To Fully Implement ECP Program.

This item addressed various observations with respect to the implementation of the established New Employee Concerns Program. The inspectors reviewed this item and determined that the observations, as stated in the subject inspection report, were accurate and still existed. In addition, the inspectors identified the following observations:

- No generic reviews are conducted on ECP files.
- No reviews of the old program for common issues are documented during the ECP file and concern closure process.
- The ECP data base is incomplete for files. The data base for concerns is complete and adequate.
- The ECP verification of corrective actions has not been formally established in the ECP Program. Currently line management is solely responsible for completion of corrective action. The New Employee Concerns procedure, Verification of Corrective Action, is still in draft form.

The above observations, including the ones made in Inspection Report 259,260,296/87-30, do not constitute regulatory issues or specific commitments by the licensee. None of the above observations resulted in regulatory or compliance issues. These observations did not contribute to any safety issues and were identified by the inspectors only for completeness. This item is closed.

5. Exit Interview (30703)

The inspection scope and findings were summarized on July 15, 1988, with those persons indicated in paragraph 1. The inspectors described the areas inspected and discussed in detail the inspection results listed below. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection. The New Employee Concerns Program files and concerns are administratively confidential and were treated as such by the inspectors.

(Open) Violation 259,260,296/88-22-01, Inadequate Corrective Action, paragraph 3.

(Closed) Unresolved Item 259,260,296/87-30-03, Lack of Formalized Methods To Fully Implement ECP Program, paragraph 4.