

DMB

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

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May 19, 1986

U.S. Nuclear Regulatory Commission
Region II

ATTN: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3 - NRC-OIE REGION II INSPECTION
REPORT 50-259/86-11, 50-260/86-11, 50-296/86-11 - RESPONSE TO VIOLATION

Enclosed is our response to J. A. Olshinski's April 21, 1986 letter to
S. A. White transmitting IE Inspection Report Nos. 50-259/86-11, 50-260/86-11,
and 50-296/86-11 for our Browns Ferry Nuclear Plant which cited TVA with one
Severity Level V Violation.

If you have any questions, please get in touch with R. E. Rogers at FTS
858-2723.

To the best of my knowledge, I declare the statements contained herein are
complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley
R. Gridley, Director
Nuclear Safety and Licensing

Enclosure

cc: Mr. James Taylor, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ENCLOSURE
RESPONSE

NRC INSPECTION REPORT NOS.
50-259/86-11, 50-260/86-11, AND 50-296/86-11
JOHN A. OLSHINSKI'S LETTER TO S. A. WHITE
DATED APRIL 21, 1986

Item 1

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

Contrary to the above, this requirement was not met for Surveillance Instruction SI 4.7.B-6, Standby Gas Treatment System - Iodine removal efficiency requires that periodic laboratory analysis of carbon samples be performed in accordance with ANSI N510-1975. ANSI N510-1975, "Testing of Nuclear Air Cleaning Systems," requires that laboratory testing of absorbent samples be performed in accordance with RDT M 16-1T (1973), "Gas-phase Absorbents for Trapping Radioactive Iodine and Iodine Compounds."

Laboratory testing of SGTS Train A carbon samples performed per SI 4.7.B-6 on July 13, 1985, were not performed in accordance with RDT M 16-1T (1973), Sections 4.5.h and 4.5.g. Only one test determination was performed as opposed to the required three tests, and the 5-hour minimum pre-equilibration period was not satisfied.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation.

2. Reasons for the Violation

Technical Specification Sections 3.7.B.2.b, 3.7.E.2.b, and 3.7.F.2.b, require that carbon samples from Standby Gas Treatment, Control Room Emergency Ventilation, and Primary Containment Purge System, respectively, be tested in accordance with ANSI N510-1975. Section 13 of ANSI N510-1975 references RDT M16-1T for charcoal analysis. The October 1973 edition of the RDT Standard addresses new carbon testing only. ANSI N510 was revised in 1980 to reference ASTM D3803 for used charcoal testing. Also, in October 1981, the RDT Standard was superseded by Nuclear Standard NE M16-1T which specifies the use of ASTM D3803 for carbon testing. The testing method employed by Browns Ferry complies with ASTM D3803. This

method only requires one test determination and "0" minutes pre-equilibration period. When the ANSI Standard was revised in 1980, we failed to revise the technical specifications to reflect the current testing method.

3. Corrective Steps Which Have Been Taken and Results Achieved

A revision to the Technical Specification Sections 3.7.B.2.b, 3.7.E.2.b, and 3.7.F.2.b has been written and is in the Browns Ferry approval process. This change should be submitted to NRR by July 3, 1986 and will reflect the ANSI N510, 1980 edition requirement.

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

Vendors that perform the laboratory testing on used charcoal will be required by the procurement document to supply a Certificate of Compliance to ASTM D3803, 1979.

5. Date When Full Compliance Will Be Achieved

Certificates of Compliance to ASTM D3803, 1979 will be requested in procurement documents by May 29, 1986. We plan to continue to test used charcoal to this standard. Full compliance will be achieved upon approval by NRR of the technical specification revision.