

TENNESSEE VALLEY AUTHORITY

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JUN 15 1989

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

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

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

BROWNS FERRY NUCLEAR PLANT (BFN) UNITS 1, 2, AND 3 - NRC INSPECTION REPORT
NOS. 50-259/88-36, 50-260/88-36, AND 50-296/88-36 - SUPPLEMENTAL RESPONSE TO
VIOLATION

This letter provides a revised completion date for the corrective action for
violation A of the subject report that was given in a letter from
C. H. Fox, Jr. to NRC dated May 5, 1989. This revision is required because a
review of the corrective actions taken to implement the commitment has found
them to be inadequate.

Enclosure 1 provides TVA's revised response. A list of commitments is
provided in enclosure 2.

If you have any questions, please telephone Patrick P. Carier, BFN, at
(205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Ralph H. Shell
for
Manager, Nuclear Licensing and
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Enclosures
cc: See page 2

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U.S. Nuclear Regulatory Commission

cc (Enclosures):

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ENCLOSURE 1

RESPONSE

NRC INSPECTION REPORT

NOS. 50-259/88-36, 50-260/88-36, AND 50-296/88-36

LETTER FROM L. J. WATSON TO O. D. KINGSLEY, JR.

DATED APRIL 10, 1989

Violation 88-36-01

Technical Specification (TS) Section 6.8.1.1.a requires that written procedures shall be established, implemented and maintained for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. The administrative procedures recommended in Appendix A of Regulatory Guide 1.33 include procedures for control of equipment. Technical Specification 6.8.1.2 further requires that each administrative procedure required by Section 6.8.1.1.a shall be reviewed by the Plant Operations Review Committee (PORC).

Contrary to above, prior to December 23, 1988, the licensee failed to properly establish an administrative procedure for the control of equipment, in that Operations Section Instruction Letter (OSIL) 43 was being used to govern system status control. As an OSIL, the procedure had not received PORC approval or other independent review.

1. Admission or Denial of the Violation (or Finding)

TVA admits the violation as stated.

2. Reason for the Violation if Admitted

The root cause of this violation was inadequate implementing procedures caused by an inaccurate interpretation of Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), Appendix A requirements.

OSIL 43, System Status Control, was written to establish a procedure for maintaining and documenting the methods used to control the status of plant systems and components. OSIL 43 did not manipulate the equipment itself, it only provided a means of monitoring equipment changes made in accordance with other approved procedures. Since OSIL 43 did not change the status of equipment itself, it was not considered an "equipment control" procedure and, therefore, did not receive PORC review as required.

3. Corrective Steps Which Have Been Taken and Results Achieved

OSIL 43 has been deleted and replaced with Plant Managers Instruction (PMI) 12.15, System Status Control, which is a PORC approved procedure. PMI 12.15 addresses NRC concerns discussed in the report as follows.

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Alignment checklists are not initialed if components are out of position. Instead, deviation sheets are completed and a deviation noted on the checklist.

Deviations on initial checklists receive screening reviews for applicability of a safety evaluation with the same approval level as required by technical specifications for temporary changes to procedures.

A copy of deviation sheets for initial checklists are maintained in the system status file until a new checklist is performed. The original deviation sheets are maintained in the Configuration Log Book until cleared. When cleared they are maintained in the Completed Configuration Log Book until a new checklist is performed. Deviation sheets and screening reviews for the deviation are Quality Assurance records.

This violation and the corrective actions have been discussed with the Operations personnel who misinterpreted the requirements of Regulatory Guide 1.33 Appendix A.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations (of Findings)

The Operations staff has reviewed the other OSILs and identified four which require upgrading to meet the review requirements of technical specification 6.8.1.2. These procedures are OSIL 11, "Environmental Data System-Trouble Reporting Procedures," OSIL 33, "Records Control-Handling QA records in Operations," OSIL 63, "Electrical Circuit Breaker Rack-In/Rack-Out," and OSIL 66, "Checklists, Logs, Inspections, and Routine Sheets." These procedures will be upgraded by August 4, 1989. Operations personnel presently involved in the preparation of procedures will be provided with a copy of this violation response by May 19, 1989.

5. Date When Full Compliance Will be Achieved

August 4, 1989

Violation 86-36-02

Technical Specification (TS) 6.8.1.1.a requires that written procedures shall be established, implemented and maintained for applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of regulatory Guide 1.33 requires procedures for control of equipment. Site Director Standard Practice (SDSP) 3.15, Independent Verification, requires that electrical lineups on equipment clearances and system alignment checklists be independently verified by individuals qualified to perform the steps being verified.

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Contrary to the above, the licensee failed to follow procedure SDSP-3.15 in that as of December 16, 1988, electrical lineups on equipment clearances and system alignment checklists were being independently verified by individuals who had not received the required electrical training for performance of independent verification of electrical lineups.

1. Admission or Denial of the Violation

TVA admits the violation.

2. Reason for the Violation if Admitted

During the initial preparation and detailed review of SDSP 3.15, the personnel involved failed to identify that parallel changes were required in SDSP 14.9, "Equipment Clearance Procedure," and PMI 12.15 "System Status Control Procedure." Operations personnel used these procedures to do independent verification for electrical lineups on equipment clearances and system alignment checklists. As a result, the requirements of SDSP 3.15 for electrical training to independently verify electrical lineups were not met.

3. Corrective Steps Which Have Been Taken and Results Achieved

SDSP 14.9 and PMI 12.15 have been revised to reference the independent verification requirements of SDSP 3.15. As a result, the requirements of all three procedures are consistent with each other. The personnel involved with the initial preparation of SDSP 3.15 no longer work for TVA.

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

Operations personnel presently involved in the preparation of operations procedures will be provided with a copy of this violation response by May 19, 1989, as a reminder of the need for careful reviews of parallel procedure revisions.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

ENCLOSURE 2

LIST OF COMMITMENTS

Violation 88-36-01

1. Operations Section Instruction Letters (OSILs) 11, 33, 63, and 66 will be upgraded to meet the review requirements of technical specification 6.8.1.2 by August 4, 1989.
2. Operations personnel presently involved in the preparation of procedures will be provided with a copy of the violation 88-36-01 response by May 19, 1989. (Complete)

Violation 88-36-02

1. Operations personnel presently involved in the preparation of procedures will be provided with a copy of the violation 88-36-02 response by May 19, 1989, as a reminder of the need for careful reviews of parallel procedure revisions. (Complete)