

TENNESSEE VALLEY AUTHORITY

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MAR 15 1989

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

Gentlemen:

In the Matter of)	Docket Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - MAINTENANCE IMPROVEMENT PROGRAM (MIP)

This letter provides the MIP for BFN. This submittal provides a basis for developing a Safety Evaluation Report.

Browns Ferry developed a MIP in March 1987 and presented it to NRC. The improvement program was designed to evaluate existing activities, identify needed improvements, and manage the changes through implementation. Approximately 200 actions were identified as necessary to significantly improve maintenance for both the near and long term.

The maintenance program at BFN is of great importance to our recovery effort. Enhancements are being implemented through continued emphasis from management to ensure that proper personnel, procedures, and programs are in place. Since the development of the initial maintenance program, BFN has requested and participated in an Institute of Nuclear Power Operations (INPO) Management Assist and Review Team Assessment for our program. Additionally, TVA also performed a self-assessment on how maintenance has been implemented at BFN. Recommendations from these assessments were then incorporated into the enclosed upgraded version of the maintenance program.

The upgraded program establishes the methodology whereby regulatory, industry, INPO and TVA bulletins, evaluations, and findings are evaluated and used to make improvements in maintenance. It consists of two essential parts, a programmatic MIP, and a detailed plan for evaluation and corrective actions, which is termed Maintenance Action Plan (MAP). The MIP establishes the basic programmatic approach and is based on INPO Guideline 85-038, "Guidelines for the Conduct of Maintenance at Nuclear Power Stations." MAPs provide the means to assess status, evaluate findings, bulletins, evaluations, etc., and take the necessary corrective actions. They also provide historical records for the entire improvement program.

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The MIP (enclosure 1) consists of 17 sections - M01-M17. Sections M01-M16 are numbered in accordance with INPO Guidelines 85-038. Section M17 was added to fully describe additional elements of the BFN's program. Individual sections contain an introduction, discussion, and guidelines section for consistency with INPO Guidelines 85-038. The guidelines provided in section "C" provide the basic criteria for establishing a programmatic approach to maintenance.

The MAP (enclosure 2) consists of forms which are used to establish responsibility, assess status, identify corrective action, establish priority, etc. for each criteria established in the MIP. Files are kept of each action plan to provide complete historical documentation of the MIP program. Individual action plan numbering is consistent with the MIP for ease of tracking.

The MIP is maintained by maintenance personnel assigned to monitor and upgrade the program as needs arise. This staff also monitors the status of corrective actions identified by the action plans. Action plans are tracked and are being included in the plant's scheduling system. Dedicated personnel ensure that appropriate attention is given to the improvement program to enhance its success.

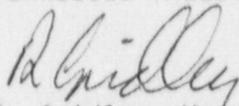
There are no TVA commitments in the MIP. Dates in the action plans are for informal planning and scheduling goals used to prioritize work.

Full implementation of the MIP will result in a maintenance program that meets the intent of the proposed 10 CFR 50.65 rule. Implementation of the improvement program is 65 percent complete.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Manager
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Enclosures
cc: (See page 3)

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