



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
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January 18, 2001

Tennessee Valley Authority
ATTN: Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT - NRC INSPECTION REPORT
50-259/00-05, 50-260/00-05, 50-296/00-05

Dear Mr. Scalice:

On December 23, 2000, the NRC completed an inspection at your Browns Ferry Units 1, 2, & 3 reactor facilities. The enclosed report documents the inspection findings which were discussed on January 5, 2001, with Mr. A. Bhatnagar and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Paul E. Fredrickson, Chief
Reactor Projects Branch 6
Division of Reactor Projects

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

Enclosure: (See page 2)

Enclosure: NRC Inspection Report 50-259,260,296/00-05

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U.S. NUCLEAR REGULATORY COMMISSION

Enclosure

REGION II

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

Report No: 50-259/00-05, 50-260/00-05, 50-296/00-05

Licensee: Tennessee Valley Authority (TVA)

Facility: Browns Ferry Nuclear Plant, Units 1, 2, & 3

Location: Corner of Shaw and Nuclear Plant Roads
Athens, AL 35611

Dates: September 24 through December 23, 2000

Inspectors: W. Smith, Senior Resident Inspector
J. Starefos, Resident Inspector
E. DiPaolo, Resident Inspector
D. Jones, Senior Health Physicist
J. Coley, Reactor Inspector

Approved by: P. E. Fredrickson, Chief
Reactor Projects Branch 6
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000259-00-05, IR 05000260-00-05, IR 05000296-00-05, on 09/24-12/23/2000, Tennessee Valley Authority, Browns Ferry Plant, Units 1, 2 and 3.

The inspection was conducted by resident inspectors, a regional senior health physicist, and a regional reactor inspector. No findings of significance were identified.

Report Details

Unit 1 has been shut down since March 19, 1985, and remained in a long-term lay-up condition with the reactor defueled.

Unit 2 operated at or near full power with the exception of scheduled brief reductions in power to adjust control rods and perform routine testing. In addition, on December 8, 2000, power was reduced to approximately 66 percent to conduct surveillance testing and facilitate implementation of a temporary modification to a main steam isolation valve operator. By December 11, 2000, full power operation was restored.

Unit 3 operated at or near full power with the exception of scheduled brief reductions in power to adjust control rods and perform routine testing.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity and Emergency Preparedness

1R01 Adverse Weather Protection

a. Inspection Scope

The inspectors performed a review of the licensee's freeze protection program. A sampling of risk-significant systems was selected, which included the emergency diesel generators (EDGs) and the emergency equipment cooling water (EECW) / residual heat removal service water (RHRSW) pumps. The inspectors reviewed Freeze Protection Printout PA304, portions of Procedure EPI-0-000-FRZ001, Revision 012, Freeze Protection Program for RHRSW Pump Rooms, Diesel Generator Bldg, and Cooling Tower Pumping Stations, portions of Procedure 0-GOI-200-1, Revision 039, Freeze Protection Inspection, and the discrepancy lists as maintained by the Unit 1 reactor operator. In addition, the inspector toured the areas associated with the sampled systems.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment

a. Inspection Scope

The inspectors performed a partial walkdown of the below-listed systems to verify operability of the redundant train when one train was out of service:

- Required EECW/RHRSW Pumps when A3 RHRSW Pump was out-of-service
- Unit 2 RHR Loop I and II during Unit 1 RHR loop II outage (supports Unit 2)
- Unit 2A standby liquid control (SLC) while 2B SLC pump was out of service
- Unit 3 RHR Loop I during Loop II 3D heat exchanger outage

A complete walkdown of the Unit 3 reactor core isolation cooling (RCIC) system was performed. The inspector reviewed the Updated Final Safety Analysis Report, associated attachments and procedures of Operating Instruction 3-OI-71, Reactor Core Isolation Cooling , Revision 28, and system drawings to determine correct system lineup. The inspector reviewed outstanding design and equipment issues through review of (1) the operator workaround list, (2) the temporary alteration control form list (3) outstanding, deferred, and canceled maintenance work requests, (4) operator turnover sheets, and (5) engineering operability evaluations. Related problem evaluation reports (PERs) were reviewed to verify that the licensee had properly identified and resolved equipment alignment problems that could impact the mitigating system availability.

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors toured the below-listed plant areas to evaluate, as appropriate, conditions related to: (1) licensee control of transient combustibles and ignition sources; (2) the material condition and operational status of selected fire protection systems, equipment and features; and (3) the fire barriers used to prevent fire damage or fire propagation.

- Intake structure, portion of fire area 25
- Unit 3 battery and battery board room, selected sample of fire area 19
- Unit 3 reactor building EL 519, portion of fire area 3
- Unit 3 reactor building EL 565, portion of fire area 3
- Unit 2/3 control building EL 593, selected sample of fire area 16
- Unit 2 battery and battery board room, selected sample of fire area 18

b. Findings

No findings of significance were identified.

1R07 Biennial Heat Sink Review

a. Inspection Scope

The inspectors reviewed the licensee's responses to NRC Generic Letter 89-13, Service Water System Problems Affecting Safety-Related Equipment, held discussions with engineers responsible for the service water system, chemical treatment of the RHRSW system, EECW system, and for air side test of RHR and core spray (CS) room coolers, to assess the effectiveness of the licensee's program for determining and maintaining the heat transfer capabilities of system heat exchangers. The following program

documents were also evaluated to verify that heat transfer capability was being maintained : Completed test procedures, maintenance procedures, 1994 heat transfer test results for the 2C RHR heat exchanger, trended flow and differential pressure test results and methods for detecting leaking tubes, eddy current examination results, visual examination records including photographs of the condition of each heat exchanger when internal surfaces were available for inspection, tube plugging drawings, and chemicals used for chemical injection of RHRSW system. Components selected for examination consisted of the RHR heat exchangers, the EDG coolers, and the RHR and CS room coolers.

In addition, one heat sink performance assessment (BFN-ENG-00-014) and two PERs related to heat exchangers were reviewed to determine whether corrective actions taken by the licensee were appropriate for the issues identified.

Walkdown inspections were also performed to verify that the heat exchangers, associated pumps, and the chemical injection facilities were being maintained effectively, as determined by their external condition.

- Preventive maintenance schedule for cleaning heat exchangers
- Completed Work Order (WO) 99-007602-000, Inspect and Clean RHR Heat Exchanger 3A, dated September 13, 2000
- Completed WO 99-007597-000, Inspect and Clean RHR Heat Exchanger 3B, dated August 30, 2000
- Surveillance Instruction (SI) 2-SI-3.2.4 EECW Check Valve Test (Unit 2 flow test) dated July 31, 2000
- SI 3-SI-3.2.4 EECW Check Valve Test (Units 2 and 3 flow test) dated September 25, 2000
- WO 00-008711-000, Clean and Eddy Current RHR Heat Exchanger 2A
- Eddy current test results for EDG coolers 1A, 1B, 1C, 1D, 3A, 3B, 3C1&2 and 3D
- Memorandum dated October 4, 1994, documenting the test results for the fully instrumented heat transfer test on the 2C RHR heat exchanger
- TVA's Detailed Design Criteria Document No. BFN-50-7023, RHR Service Water System Units 2 & 3
- TVA's Design Criteria Document No. BFN-50-7067, EECW System Unit 2 & 3
- TVA's BFN Mechanical Corrective Instruction No. MCI-0-074-HEX001, Maintenance of RHR Heat Exchangers, Revision 8
- BFN Plant Final Safety Analysis Report Sections BFN-16 Subsection 4.8 and BFN-17 Subsection 10.10.1
- TVA Standard Programs and Processes Procedure No. SPP-3.3, Rev. 5, NRC Commitment Management
- TVA, BFN Unit 2 and 3 RHR heat exchanger tube plugging maps
- Trended data for Unit 2 differential pressure across RHR heat exchangers February 26, 1991 to July 18, 2000
- Trended flow data for Unit 3 A & C RHR & CS room coolers, December 8, 1995 to September 26, 2000
- Trended flow data for Unit 3, EDG 3A, and Unit 1 EDG 1D, February 11, 1992 to September 26, 2000

- BFN Assessment No. BFN-ENG-00-014, Heat Sink Performance
- BFN PER 97-001333-000
- BFN PER 95-000654-000

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification Program

a. Inspection Scope

On November 20, 2000, the inspectors observed operator requalification testing activities in the plant simulator and the subsequent evaluator's discussions and feedback to the crew. The inspector observed crew performance in terms of the group dynamics involved in the accomplishment of the tests.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation

a. Inspection Scope

For the equipment issues described below, the inspectors reviewed the licensee's implementation of the Maintenance Rule (10 CFR 50.65) to assess the effectiveness of the licensee's maintenance efforts that apply to scoped structures, systems, and components (SSCs):

- Unit 2 high pressure coolant injection (HPCI) isolation caused by incorrect placement of relay contact inhibiting boots during testing on June 17, 1999
- Unit 3 reactor scram while returning reactor water level instrument to service on May 24, 2000
- Unit 3 CS Loop I functional failure during residual heat removal system testing on September 21, 2000
- Unit 2&3 EECW pump A3 cracked pump head in May 2000
- Unit 2&3 main turbine electro-hydraulic control (EHC) backup pressure regulator failures in October - December 2000
- RHR crosstie performance criteria exceeded and performance criteria revisions (Cause Determination Evaluation 2000-11-02)

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessment and Emergent Work Controla. Inspection Scope

The inspectors evaluated the effectiveness of the licensee's risk assessments and the implementation of compensatory measures for the planned maintenance activities listed below. The inspectors also verified that, upon identification of the emergent (unforeseen) equipment problems listed below, the licensee had taken the necessary steps to plan and control the resulting emergent work activities to minimize plant risk:

- Standby gas treatment system Train B outage of October 17-18, 2000 (planned)
- Operation of both Units 2 and 3 with EHC pressure regulator B failed on both units (emergent)
- Troubleshooting of Units 2 and 3 EHC pressure regulator demodulators and transducers while on line on November 16, 2000 (emergent)
- Repair of Unit 3 EHC pressure regulator B while the unit was at full power on November 30, 2000 (planned)
- Repair of Unit 2 EHC pressure regulator B, while the unit was at full power on December 7, 2000 (planned)
- Installation of alternate power source for the Unit 2 B inboard main steam isolation AC solenoid per temporary alteration control form (TACF) 2-2000-14-001 on December 9, 2000 (planned)

b. Findings

No findings of significance were identified.

1R15 Operability Evaluationsa. Inspection Scope

The inspectors reviewed the following operability evaluations affecting mitigating systems or barrier integrity to ensure that operability was properly justified and the component or system remained available such that no unrecognized increase in risk occurred:

- Associated plant equipment operability (primary containment and core spray) during the performance of maintenance on valve 2-FCV-75-2, CS pump 2A suction valve, per WO-00-006736-000, performed on October 6, 2000
- Unit 3 control rod 18-27 position indication loss on October 15, 2000
- Technical operability evaluation (TOE) 3-00-071-11480, operability of Unit 3 RCIC after running the pump at shutoff head on November 1, 2000
- TOE 3-00-030-11604, fire damper found partially open at ventilation intake plenum in the 3A EDG building identified on November 5, 2000
- PER 00-012618-000, Unit 2 RCIC turbine control valve indicated closed instead of open in the main control room on December 7, 2000
- PER 00-012752-000, operability evaluation of fire barrier draft stop, separating fire zones 2-4 and 2-5 found out of normal configuration on December 19, 2000

b. Findings

No findings of significance were identified.

1R16 Operator Workaroundsa. Inspection Scope

The inspectors reviewed the status of selected operator workarounds to determine if the functional capability of the system or operator reliability in responding to an initiating event was affected. This included evaluating the effect of the operator workaround on the operator's ability to implement abnormal or emergency operating procedures. The following operator workarounds were reviewed:

- Unit 3 Priority 1 workaround: Seal steam pressure regulator (3-PCV-1-147) isolated
- Unit 3 Priority 1 workaround: Reactor water cleanup blowdown shutoff valve (3-SHV-069-0553) closed due to excessive leakage
- Unit 3 Priority 2 workaround: Startup level controller (3-LIC-3-53) blank panel display in main control room.

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing (PMT)a. Inspection Scope

The inspectors reviewed the performance of the following activities to verify that the PMT was adequate to verify system operability and functional capability:

- Unit 2 HPCI system PMTs per WO 99-008606-000, WO 99-8606-001, WO 99-005520-000, WO 99-013266-000, WO 00-005301-000, WO 00-1008-000, and WO 00-004068-000, performed September 27-28, 2000
- EECW Pump A3 replacement PMTs per WO 99-009276-026 and WOs 00-008113-000/1/2, performed October 30-November 4, 2000
- Unit 1 RHR Loop 2 maintenance outage PMTs per WOs 99-009331-010, 99-009332-002, 00-004352-000, 00-004365-000, and 00-005725-000, completed by November 14, 2000
- Unit 2 TACF 2-2000-14-001, to provide auto-transfer to emergency power for the B inboard main steam isolation valve (MSIV) AC solenoid, post installation test per WO 00-009459-003 performed December 9, 2000
- Unit 3 EDG D soak-back lube oil filter o-ring replacement PMT on December 11, 2000 per WO 00-011766-000
- EECW pump B3 packing replacement PMT per WO 00-008864-000 performed on December 15, 2000

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors witnessed surveillance testing and/or reviewed completed test data from the selected risk-significant SSC surveillance procedure (SPs) listed below, to assess whether the SSCs met Technical Specification (TS), the updated final safety analysis report (UFSAR), and licensee procedure requirements, and to determine if the testing effectively demonstrated that the SSCs were operationally ready and capable of performing their intended safety functions. In addition, for in-service testing from the selected risk significant mitigating system pump and valve SPs listed below, the inspectors evaluated the effectiveness of the licensee's American Society of Mechanical Engineers (ASME) Section XI testing program to determine equipment availability and reliability. The inspectors also reviewed test procedures for appropriateness of acceptance criteria and testing methods, compliance with the licensee's in-service testing program, TS, and ASME Code, and corrective actions where applicable:

Surveillance Testing

- SP 3-SR-3.8.1.1(3D), Diesel Generator 3D Monthly Operability Test, Revision 0011, performed September 24, 2000
- SP 2-SR-3.3.1.1.7, Reactor Protection System Local Power Range Monitor Calibration, Revision 3, performed October 19, 2000
- SP 2-SR-3.5.1.1(RHR II), RHR System Venting Loop II, Revision 2, performed November 17, 2000
- SP 3-SR-3.3.5.1.5(RWL A), Core and Containment Cooling Systems Reactor Low Water Level Instrument Channel A Calibration 3-L-3-58A, Revision 3, performed on December 5, 2000

In-Service Testing

- SP 2-SR-3.5.1.7, HPCI Main and Booster Pump Set Developed Head and Flow Rate Test at Rated Reactor Pressure, Revision 14, performed September 28, 2000
- SP 3-SR-3.5.1.6(RHR II), Quarterly RHR System Rated Flow Test Loop II, Revision 8, performed December 21, 2000

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications

a. Inspection Scope

The inspectors conducted a review of the list of active temporary plant modifications provided by the licensee. The following temporary modification was selected because the system was determined to be a key system from a probabilistic safety assessment perspective: TACF 2-2000-14-001 -- The DC solenoid on the operator for Unit 2 inboard MSIV B did not show continuity.

This TACF enhanced the reliability of the MSIV (2-FCV-1-26) by providing an automatic transfer to emergency power for the AC solenoid upon loss of RPS A, such that the MSIV will not close due to a single active failure. The 10 CFR 50.59 safety evaluation and selected sections of the UFSAR and TSs were reviewed. In addition, the inspectors performed a detailed technical review of the modification to confirm functionality, and reviewed the changes to the applicable control room alarm response procedure.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control to Radiologically Significant Areas

a. Inspection Scope

The inspectors toured the reactor and turbine buildings and verified that high radiation areas (HRAs) and locked high radiation areas (LHRAs) were properly posted, barricaded, and locked. A total of approximately 25 areas were checked. The inspectors reviewed the procedurally established access controls for HRAs and LHRAs. Incorporation of those controls into selected radiation work permits (RWPs) typically used for work in those areas was also reviewed. The RWPs selected were: No. 75 Radwaste Support Activities, No. 111782 Maintenance on Fuel Pool Cooling (FPC) System, No. 222115 Rebuild 2B Reactor Water Cleanup Pump, No. 222852 Maintenance on Control Rod Drive System, and No. 222502 Install Orifices in FPC Piping and Associated Work. Adherence to RWP specified access controls by radiation workers and radiation protection technicians working at three HRA job sites was observed by the inspectors. Those job sites were the Unit 1 and Unit 2 FPC heat exchanger and pump areas and the Unit 2 East scram discharge volume cage. The inspectors also verified that the dose rates in the Unit 2 East scram discharge volume cage and the Unit 2 FPC heat exchanger and pump area were consistent with the pre-job area surveys. The effectiveness of characterization and resolution for selected

radiation protection related issues identified during July through October 2000, was evaluated by the inspectors. Through the above reviews and observations, the licensee's access control program implementation and practices were evaluated by the inspectors for consistency with Technical Specifications and 10 CFR Part 20 requirements.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

Licensee records were reviewed by the inspectors under the guidance of IP 71151 to determine whether the submitted PI statistics were calculated in accordance with the guidance contained in NEI 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 0.

Cornerstone: Initiating Events

.1 Scrams With Loss of Normal Heat Removal

a. Inspection Scope

The inspectors performed a review of the Unit 2 and 3 PI data for the second quarter of 2000 to verify the accuracy and completeness of the Scrams With Loss of Normal Heat Removal PI. Documentation reviewed included the control room operator logs, licensee event reports, monthly operating reports, and the PI data provided at the NRC web site.

b. Findings

No findings of significance were identified.

Cornerstone: Mitigating Systems

.2 Safety System Unavailability-High Pressure Injection System

a. Inspection Scope

The inspectors performed a review of Units 2 and 3 PI data for the second and third quarters of 2000 to verify the accuracy and completeness of the Safety System Unavailability (HPCI) PI. Documentation reviewed included the control room operator logs, licensee review and verification reports, the licensee's maintenance rule data base, PERs associated with the system, and the PI data provided by the NRC web site.

b. Findings

No findings of significance were identified.

4OA3 Event Follow-up

- .1 (Closed) LER 50-296/2000-007-000 Inoperability of Two Emergency Core Cooling System (ECCS) Injection/Spray Subsystems During Surveillance Testing. On September 21, 2000, with Unit 3 operating at 100% power, and with RHR Loop 1 out of service, CS Loop 1 was rendered inoperable during surveillance testing. A fuse cleared in the CS logic circuit, which was considered by the licensee as most likely caused by a short circuit inadvertently induced by test personnel. With two subsystems inoperable, TS 3.5.1, Action H, required the operators to enter TS LCO 3.0.3, which required initiating actions within one hour to place the unit in a shutdown condition. However, within 24 minutes the fuse was replaced and CS Loop 1 operability was restored, and therefore a reactor shutdown was not initiated. The licensee entered the problem into the corrective action program under PER 00-10181-000. This event did not constitute a violation of NRC requirements, and the issue was of very low safety significance.

4OA5 Other

- .1 Review of Institute of Nuclear Power Operations (INPO) Accreditation Report

The inspectors reviewed the Accreditation Evaluation Report of September 2000, which summarized the results of a TVA self-evaluation and an INPO accreditation team evaluation of training, conducted during the weeks of June 12 and June 19, 2000. The report did not reflect any significant differences between NRC and INPO perceptions.

4OA6 Management Meetings

4OA6 Management Meetings

The inspectors presented the inspection results to Mr. Ashok Bhatnagar, Plant Manager, and other members of licensee management on January 5, 2001. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

LIST OF PERSONS CONTACTEDLicensee

T. Abney, Licensing Manager
A. Bhatnagar, Plant Manager
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J. Grafton, Site Quality Assurance Manager
J. Herron, Site Vice President
R. Jones, Site Support Manager
G. Little, Operations Manager
D. Sanchez, Training Manager
M. Scaggs, Maintenance and Modifications Manager
R. Wiggall, Site Engineering Manager

NRC

R. Bernhard, Region II Senior Reactor Analyst

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSEDClosed

50-296/2000-007-000	LER	Inoperability of Two ECCS Injection/Spray Subsystems During Surveillance Testing (Section 4OA3.1).
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