

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

Tennessee Valley Authority
LP 3D-C, 1101 Market Street
Chattanooga, Tennessee 37402-2801
Oak Ridge, TN 37830

REPORT NUMBER

2015001

2. NRC/REGIONAL OFFICE

U.S. Nuclear Regulatory Commission
Region I, 2100 Renaissance Blvd, Suite 100
King of Prussia, Pennsylvania 19406-2713

3. DOCKET NUMBER

03032925

4. LICENSE NUMBER

41-25219-01

5. DATE OF INSPECTION

April 14, 2015 ~~June 29, 2015~~

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- ☐ 1. Based on the inspection findings, no violations were identified.
- ☐ 2. Previous violation(s) closed.
- ☐ 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

Non-cited violation(s) were discussed involving the following requirement(s) and corrective action(s):

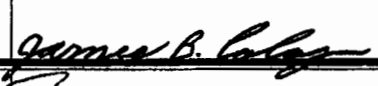

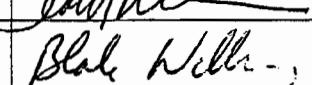
- ☒ 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with the NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11. (Violations and Corrective Actions)

- A. License Condition 25 states, in part, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. One of the documents listed below was a letter and license application dated July 17, 2013. Attachment 3 of the application included a section entitled "Fixed Gauge Non-Routine Operations and Maintenance Procedure" which stated in part, that (1) Non-routine operations and maintenance also includes any work performed near fixed gauges that are installed such that an individual could place a part of their body in the air gap between the nuclear gauge and detector (e.g., installations on vessels, bins, tanks, hoppers, and conveyor belts); and (2) At least one survey instrument will be available and used for surveys by specifically authorized individuals when non-routine operations and maintenance is performed.

(Continued on next page)

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE	James B. Colagross		07-01-2015
NRC INSPECTOR	Scott Wilson		July 1, 2015
BRANCH CHIEF	Blake Welling		July 1, 2015

SUNSI Review Completed By:

Scott Wilson



Public



Non-Sensitive

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April 14, 2015 ^{NA} June 29, 2015

A. (Continued from page 1)

Contrary to the above, on April 14, 2015, Tennessee Valley Authority did not use a survey instrument to perform radiation surveys when non-routine operations and maintenance was performed. Specifically, the licensee did not ensure that a survey instrument was used for surveys when non-routine maintenance was performed within hoppers at the facility, where individuals could place a part of their body in the air gap between the nuclear gauge and detector.

This is a severity level IV violation (Enforcement Policy Section 6.3).

As corrective and preventative actions, and at the next opportunity, Tennessee Valley Authority (TVA) will survey the air gap within any hoppers, where individuals could place a part of their body in the air gap between the nuclear gauge and detector, using a portable survey instrument. TVA will revise its non-routine maintenance procedures to ensure the air gap within the hoppers is surveyed prior to maintenance in the hoppers. TVA will ensure that all individuals responsible for gauge radiation safety and non-routine operations at the facility will be provided refresher training on the new revised procedure.

- B. License Condition 25 states, in part, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The documents listed below included a license application dated July 17, 2013. Item No. 10 of the application provided, in part, that "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions." The gauge manufacturer, Vega Americas, Inc.'s Technical Reference Manual, Document ID 31532, Section 3.4, stated, in part, that: (1) the source holder must have a label that states the type and quantity of radioactive material and the date of manufacture; (2) the label must bear the radioactive trefoil; and, (3) it is the gauge user's responsibility to perform regular maintenance of the label(s) and keep them in a legible condition.

Contrary to the above, on April 14, 2015, Tennessee Valley Authority did not maintain its gauge labels in a legible condition according to the manufacturer's written recommendations and instructions. Specifically, six Vega Americas, Inc. gauge labels were illegible due to particulate contaminants obscuring them and three gauges had labels that were in various stages of corrosion and partially illegible.

This is a severity level IV violation (Enforcement Policy Section 6.3).

As corrective and preventative actions, TVA will increase the inspection frequency of its nuclear gauges as necessary to ensure the labels are legible. The nuclear gauge inspection frequency will change as necessary to ensure the nuclear gauge labels remain legible, but will not exceed 6 months. Labels that are determined to be illegible during the inspection will be documented and entered into TVA's Corrective Action Program and appropriate actions taken to initiate replacement.

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