

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

USNRC REGION II
ATLANTA, GEORGIA

400 Chestnut Street Tower II

October 30, 1981

81 NOV 3 A 8:31

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II EMERGENCY
PREPAREDNESS APPRAISAL - 50-327/81-20, 50-328/81-24 - SUPPLEMENTAL
RESPONSE

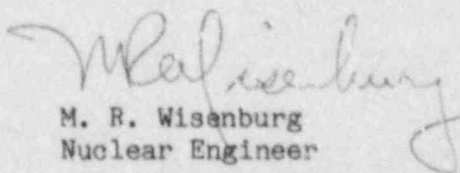
The subject appraisal dated August 20, 1981 cited TVA with one
Severity Level IV Violation and four deficiencies. TVA submitted the
response to these items on September 24, 1981. Enclosed is our
supplemental response which addresses the NRC's additional concerns as
listed in attachment 2 of the inspection report. This matter was
discussed with G. R. Jenkins of your office on October 8, 1981.

If you have any questions, please get in touch with R. H. Shell
at FTS 858-2688.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY


M. R. Wisenburg
Nuclear Engineer

Enclosure

cc: Mr. Victor Stello, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO ADDITIONAL CONCERNS

Finding: 81-20-04/81-24-04

The auditor informed the licensee that due to the proximity and capability of the training center laboratory facility, it should be considered for use during an emergency and that the REP and IPD be changed accordingly.

Response:

TVA agrees with this finding and is evaluating the need for an alternate laboratory.

Finding: 81-20-05/81-24-05

The auditors pointed out that anyone requiring personnel decontamination should have immediate access to the decon room and the policy of maintaining the doors to these rooms locked should be reviewed and revised as necessary so that decontamination of individuals can be completed as rapidly as possible.

Response:

TVA agrees with this finding. The program as stated in the audit finding is acceptable; however, the door to the personnel decontamination room will be unlocked by October 30, 1981.

Finding: 81-20-06/81-24-06

Review the calibration and calculational methods for use of the MS-2 and sodium iodide emergency sample counter with consideration given to the effect of high external background radiation, the effect of high levels of radionuclides in the sample and the effect of self shielding of the radionuclide of interest in the charcoal or silver zeolite cartridges.

Response:

TVA agrees with this finding. The calibration procedure for the sodium iodide detectors will be reviewed and modified as necessary to incorporate geometry and self-absorption factors. The possibility of providing further detector shielding to reduce background interference shall be considered. This review and modification will be completed by December 31, 1981.

Finding: 81-20-07/81-24-07

Consider a system for assuring that the appropriate NaI detector and the MS-2 with which it was calibrated are transported to the health physics van.

Response:

TVA agrees with this finding. The detectors and analyzers will be marked so as to ensure proper matching of components by December 31, 1981.

Finding: 81-20-08/81-24-08

Revise procedures and instructions to health physics personnel to assure that necessary keys are available for vehicles and sampling stations.

Response:

TVA agrees with this finding. Sequoyah Implementing Procedure IP-17 was revised July 30, 1981 to include, in one package, all keys to vehicles and environmental sampling stations.

Finding: 81-20-09/81-24-09

Provide procedures and instructions to emergency response teams on the use of silver zeolite cartridges.

Response:

TVA agrees with this finding. Sampling procedures are being revised to provide instructions to field monitoring and plant personnel regarding the use of silver zeolite cartridges. This item will be completed by October 30, 1981.

Finding: 81-20-11/81-24-11

Clarify procedures SQN IP-17 and MSECC IP-6 to assure appropriate monitoring and sampling equipment is provided to both plant emergency teams and offsite emergency teams.

Response:

TVA agrees with this finding. Additional equipment will be purchased or identified for use by plant and offsite emergency teams to ensure that appropriate instrumentation is available and its use will not detract from normal plant instrument inventory. An additional vehicle will be dedicated to the plant health physics staff for emergency use.

Finding: 81-20-13/81-24-13

Provide emergency procedures and instructions for health physics personnel defining methods, equipment, communications and radiation protection guidance for emergency onsite (out-of-plant) radiological surveys.

Response:

TVA agrees with this finding. Emergency procedures are being developed and implemented for health physics personnel to define methods, equipment, communications, and radiation protection guidance for emergency onsite (out-of-plant) radiological surveys.

Finding: 81-20-14/81-24-14

Provide emergency procedures and instructions for health physics personnel defining methods, equipment, communications, radiation protection and dose control guidance for emergency inplant surveys.

Response:

TVA agrees with this finding. A procedure addressing the finding has been drafted and is presently in routing for review and comment. This item should be completed by December 31, 1981.

Finding: 81-20-15/81-24-15

The implementing procedures should be clarified to indicate where personnel shall be decontaminated and what nonstandard decontamination techniques may be necessary for specific levels and types of contamination.

Response:

TVA agrees with this finding. Sequoyah Nuclear Plant Health Physics Section Instruction Letter Number 10, Personnel Decontamination and Confiscation of Contaminated Articles, describes the procedures for personnel decontamination. Several decontamination techniques are outlined in this procedure. Implementing Procedure 14, Health Physics Procedure, will also be revised to indicate the location of the decontamination facilities.

Finding: 81-20-16/81-24-16

Procedures should specify how the documentation control is to work. The responsibility for each review and the means of assuring that each is done on schedule should be specified.

Response:

TVA agrees with this finding. REPP-5 (which was not available in final form during the audit) adequately covers document control for the radiological emergency plan and implementing procedures document.

Finding: 81-20-17/81-24-17

The REP is not clear that areas other than the plan itself will be audited. The REP should be revised accordingly.

Response:

TVA does not agree with this finding. The quality assurance (QA) and audit programs are defined by TVA-TR 75-1 and the Radiological Hygiene Branch QA manual. These documents provide for the audit of both the REP and IPD. No further clarification of this part is deemed necessary in the REP.

Finding: 81-20-18/81-24-18

Designate an individual onsite who has overall responsibility for coordinating drills and exercises required by the REP and applicable criteria.

Response:

TVA does not agree with this finding. All exercises and drills are tracked by the Radiological Emergency Preparedness and Protection Group. The responsible organization, as defined in the REP, coordinates the drill or exercise with the designated site REP coordinator as necessary.