

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

December 10, 1982 17:54

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/82-24 AND 50-328/82-25 - RESPONSE TO VIOLATION

This is in response to D. M. Verrelli's letter to H. G. Parris dated  
November 4, 1982 concerning a routine safety inspection conducted during  
October 12-15, 1982 at Sequoyah Nuclear Plant.

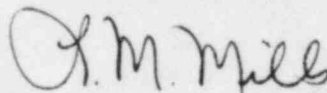
The subject violation report cited TVA with one Severity Level V  
Violation. Enclosed is our response to the violation.

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



L. M. Mills, Manager  
Nuclear Licensing

Enclosure

cc: Mr. Richard C. DeYoung, Director (Enclosure)  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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ENCLOSURE

SEQUOYAH NUCLEAR PLANT  
RESPONSE TO VIOLATION

50-327/d2-24 and 50-328/82-25

VIOLATION

Technical Specification 6.8.4.b requires that written procedures shall be established, implemented and maintained by the Radiological Hygiene Branch covering the Quality Assurance Program and environmental monitoring, using the guidance contained in Regulatory Guide 4.15, December 1977.

Procedure No. NR-OPS-FO-NRE-62.3 (Calibration of Radiation Monitors) which implements Technical Specification 6.8.4.b requires calibration of environmental radiation monitoring equipment at six (6) month intervals, and posting of calibration stickers on or near the monitor.

Contrary to the above, Procedure No. NR-OPS-FO-NRE-62.3 was not implemented in that:

1. Background radiation monitors and air monitor flow meters at all assigned air particulate/radioiodine monitoring stations were not calibrated within the required six (6) month interval in the case of stations LM-1, LM-2, and PM-1 through PM-8.
2. Calibration stickers documenting the most recent calibrations were not posted on or near the monitors as required.

This is a Severity Level V Violation (Supplement IV.E).

ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Monitors LM-1, LM-2, and PM-1 through PM-8 were not calibrated within the required six-month interval; therefore, we admit violation of this requirement. It should be noted that section 2.0 (not section 6.4 as stated in the Report Details) of Natural Resource Operations Procedure No. NR-OPS-FO-NRE-62.3 "requires that radiation monitors shall be calibrated at six-month intervals." Also, in section 5.d of the Report Details, the inspector reports that the "previous calibration of air monitor flow meters and background radiation monitors for stations LM-1 and LM-2 was February 23, 1981, and March 3-9, 1981, in case of air monitoring stations PM-1 through PM-8." We believe the dates were inadvertently listed in error in the report as the actual dates of the previous calibrations were as follows:

<u>Station No.</u>	<u>Date</u>	<u>Station No.</u>	<u>Date</u>
LM-1	23 FEB 82	PM-4	9 MAR 82
LM-2	25 FEB 82	PM-5	3 MAR 82
PM-1	9 MAR 82	PM-6	3 MAR 82
PM-2	1 MAR 82	PM-7	3 MAR 82
PM-3	9 MAR 82	PM-8	3 MAR 82

In addition, it was stated that there were no calibration stickers posted on or near the monitors. The Report Details states that such stickers are required in section 6.9.5 (rather than 6.5) of NR-OPS-FO-NRE-62.3. There is no requirement in NR-OPS-FO-NRE-62.3 providing for the placement of a calibration sticker on or near the monitor. The procedure does require the use of a "label" on the panel beside the monitor flowmeter that contains information concerning the air flowmeter setting. This is not considered a calibration record for the monitor; however, provision is made in the procedure for calibration records. A calibration record form (attachment 1 of the procedure) is completed during the calibration of each monitor. These forms are maintained by the Field Operations, Eastern Area (FO EAST) Knoxville office, for the lifetime of the plant and in the FO EAST, Chattanooga field office, for one year (section 8.1 of the procedure). We agree that use of calibration stickers may be appropriate, but we know of no requirement for their use; therefore, we deny this alleged violation.

#### REASON FOR THE VIOLATION IF ADMITTED

The reason for the calibration frequency violation was insufficient administrative control on the part of FO EAST. Calibration of the monitors had been scheduled within the six-month period but was postponed because of other work and inadvertently not rescheduled.

#### CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

All monitors were calibrated immediately after the OIE inspection. The following are the dates on which each monitor was calibrated.

<u>Station No.</u>	<u>Date</u>	<u>Station No.</u>	<u>Date</u>
LM-1	15 OCT 82	PM-4	16 OCT 82
LM-2	15 OCT 82	PM-5	16 OCT 82
PM-1	16 OCT 82	PM-6	15 OCT 82
PM-2	15 OCT 82	PM-7	15 OCT 82
PM-3	15 OCT 82	PM-8	16 OCT 82

#### CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

An administrative procedure has been implemented in FO EAST which schedules and tracks the calibration of the radiation monitors at Sequoyah. This procedure will provide a reminder of the need to recalibrate the monitors, and the reminder will not be cancelled until the calibration is complete. In addition, as part of TVA's overall control plan, a copy of the calibration record form will be sent to Health Physics Services staff.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

TVA was in full compliance on December 2, 1982.