

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

December 6, 1982

DEC 13 1982 AID: 10

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

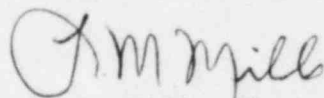
Dear Mr. O'Reilly:

Enclosed is our response to your November 3, 1982 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/82-26, -260/82-26, -296/82-26 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our response to Appendix A, Notice of Violation. If you have any questions, please call Jim Domer at FTS 858-2725.

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

ENCLOSURE
RESPONSE - NRC INSPECTION REPORT NOS.
50-259/82-26, 50-260/82-26, AND 50-296/82-26
J. P. O'REILLY'S LETTER TO H. G. PARRIS
DATED NOVEMBER 3, 1982

APPENDIX A

Item A (259, 260, 296/82-26-02)

10 CFR 71.5(a) requires a licensee, who transports any licensed material outside the confines of his plant or other place of use, or delivers any licensed material for transport, to comply with the applicable requirements of the Department of Transportation regulations presented in 49 CFR Parts 170 through 189 insofar as such regulations relate to matters which include packaging of byproduct, source, or special nuclear material.

10 CFR 71.31(a) requires that the packaging of licensed materials shall be of such materials and construction that there will be no significant chemical reaction between the packaging component and the package contents. (Similar requirements in 49 CFR 173.24(c)(5) and 49 CFR 173.393(n)(1).)

Technical Specification 6.3.A.7 requires written procedures, including applicable checkoff lists be prepared, approved and adhered to covering Radiation Control Procedures. Radiation Control Instruction 5, Shipment of Radioactive Materials, Section V.F.2 requires each shipment of radioactive material to be accompanied by a completed and accurate Radioactive Material Shipment Record describing the proper physical and chemical form of the material being shipped, when the material is in normal form.

Contrary to the above, on August 17, 1982, the licensee shipped radioactive material of Low Specific Activity (LSA), TVA shipment No. 1862, to U.S. Ecology, Inc., Richland, Washington, for burial which failed to meet these requirements in that licensee did not perform an adequate test or examination of the contents of one 55-gallon drum containing an estimated 1 to 2 liters of acidic solution, which later caused a breach of the container.

Also, the Radioactive Material Shipment Record required by procedure RCI-5, Section V.F.2, written in accordance with Technical Specification 6.3.A.7, did not accurately describe the proper physical and chemical form of the material being shipped.

This is a Severity Level III Violation (Supplement V).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

An analysis to determine the root cause of the violation was conducted. The results indicated that the violation was caused by inadequate control over items placed in containers for shipment and ultimate disposal and lack of provisions for verification of, and accountability for, container contents.

3. Corrective Steps Which Have Been Taken and Results Achieved

Browns Ferry Standard Practice BF 7.9, Control of Solid Radwaste Packaging - Drum and Boxes, was formally approved and implemented on October 29, 1982. This program specifically requires:

- a. The verification of all container contents before loading for shipment
- b. The use of control tags to certify individual container content and its originator
- c. The training of all individuals involved in container packaging (Formal training was begun on August 24, 1982.)
- d. Engineering evaluation of any item other than paper, plastic, metal, and wood
- e. Increased surveillance of the packaging program by quality assurance personnel

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

In addition to implementation of Browns Ferry Standard Practice BF 7.9, an engineer has been assigned full time to coordinate solid radwaste shipment activities until the program is upgraded to our satisfaction. This full-time engineering assignment will continue until the present backlog of solid radwaste has been eliminated. .

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 25, 1982. (Browns Ferry Standard Practice BF 7.9 was implemented in draft form on this date before formal approval on October 29, 1982.)

Item B (259, 260, and 296/82-26-01)

10 CFR 71.5(a) requires a licensee who transports any licensed material outside the confines of his plant or other place of use, or delivers any licensed material for transport, to comply with the applicable requirements of the Department of Transportation regulations presented in 49 CFR Parts 170 through 189 insofar as such regulations relate to matters which include the packaging of byproduct, source or special nuclear material and the marking and labeling of the packages.

49 CFR 172.392(c)(8) requires that for packaged shipments of low specific activity materials, transported in vehicles other than aircraft assigned for the sole use of that assignment, must have the outside of each outside package stenciled or otherwise marked "Radioactive - LSA."

Contrary to the above, on July 20, 1982, the licensee delivered a shipment of radioactive material for transport, (TVA Shipment No. 1840), to U.S. Ecology, Inc., Richland, Washington, for burial without the proper markings (Radioactive LSA) on eight wooden containers, as required by 49 CFR 173.392(c)(8).

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

An analysis to determine the root cause of the violation was conducted. The results indicated that the violation was caused by an incompatibility between the adhesive used on the LSA labels and the painted wooden surface of the box.

3. Corrective Steps Which Have Been Taken and Results Achieved

Browns Ferry Standard Practice BF 7.9, Control of Solid Radwaste Packaging - Drum and Boxes, was formally approved and implemented on October 29, 1982. This required that all LSA labels on boxes be stapled before offsite shipment. Increased surveillance of the packaging program by quality assurance personnel has been implemented.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

In addition to implementation of Browns Ferry Standard Practice BF 7.9, an engineer has been assigned full time to coordinate solid radwaste shipment activities until the program is upgraded to our satisfaction. This full-time engineering assignment will continue until the present backlog of solid radwaste has been eliminated.

5. Date When Final Compliance Will Be Achieved

Full compliance was achieved on July 29, 1982. (Browns Ferry Standard Practice BF 7.9 was implemented in draft form on this date before formal approval on October 29, 1982.)