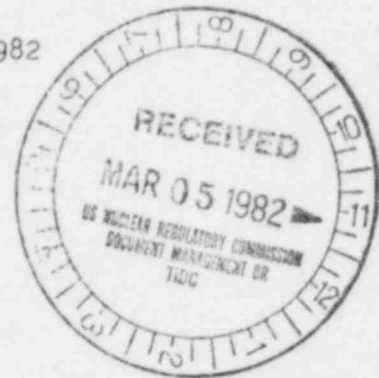


TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

February 12, 1982



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:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II EMERGENCY
PREPAREDNESS APPRAISAL - 50-327, 50-328 - RESPONSE TO VIOLATION AND
DEFICIENCIES - REVISED FINAL REPORT

The subject appraisal dated August 20, 1981 cited TVA with one Severity Level IV Violation and four deficiencies. Our initial response was provided to you on September 24, 1981. A supplemental response was submitted on November 20, 1981 to extend the completion date for revision of the Sequoyah Radiological Emergency Plan (REP) from November 15, 1981 to December 15, 1981. As discussed with D. Quick of your staff in a telephone conversation on February 4, 1982, TVA was unable to complete all corrective actions by the schedule provided in the September 24, 1981 response. Enclosed are revised responses for the violation (Enclosure 1) and deficiencies (Enclosure 2).

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 Regulation and Safety

Enclosure

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

8203080444 820212
PDR ADOCK 05000327
S PDR

OFFICIAL COPY

TE 275/11

ENCLOSURE 1
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO VIOLATION
REVISED FINAL REPORT

Violation

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering Site Radiological Emergency Plan implementation.

Contrary to the above, the Technical Specification requirement for written procedures that implement the Site Radiological Emergency Plan was not met in that:

- a. There was no written procedure covering the activation, staffing, and operation of the Interim Emergency Operations Facility defined in Section 3.1.2.5 of the Sequoyah Site Emergency Plan.
- b. Sequoyah Technical Instruction TI-66, Post Accident Sampling and Analysis Methods, was not implemented in that equipment required by TI-66 to reduce personnel exposure during post accident sampling was not available; also TI-66 was found to be inadequate in that it did not address post accident sampling of high activity liquid effluents.
- c. There was no written procedure for use by the Plant's Emergency Offsite Monitoring Team to provide initial offsite environmental assessment following an accident as required by Section 6.2.2.1 of the Sequoyah Site Emergency Plan.
- d. There was no written procedure addressing implementation of exercises and drills required by Section 9.2.2 and 9.2.3 of the Sequoyah Site Emergency Plan.

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

Admission or Denial of the Alleged Violation

- Item a. TVA admits the violation occurred as stated.
- Item b. TVA denies the violation.
- Item c. TVA admits the violation occurred as stated.
- Item d. TVA admits the violation occurred as stated.

Reasons for the Violation

- Item a. An operating procedure for activation, staffing, and operation of the interim emergency operations facility was in draft form at the time of the emergency preparedness appraisal but had not been submitted as a formal change to the Sequoyah Implementing Procedures Document.

Item b. There are two distinct issues in item b. The first issue deals with equipment used solely for obtaining postaccident samples for analysis. As discussed in item 4.1.1.7 of the report, all equipment required by the procedure was available except a transport cart for which we believe an acceptable alternative could be made available. The second issue deals with providing procedures for postaccident sampling of liquid effluents in plant systems before release to the environment. (See section 4.1.1.8 of the report.)

Concerning the issue of providing 'sole use' equipment, TVA denies the violation occurred as stated.

TVA disagrees with the finding that implies that because 'sole use' equipment was not available a violation exists. TVA contends that the equipment would be available as discussed with the auditor.

Concerning the issue of postaccident liquid effluent sampling procedures, TVA denies the violation occurred as stated.

TVA disagrees with the report's finding concerning inadequate postaccident sampling procedures for high activity liquid effluents. Liquid effluents in this violation are those other than in the Reactor Coolant System. TVA cannot find any requirement relating to postaccident sampling of liquid effluents in systems other than the Reactor Coolant System in the regulations or guidance previously supplied by the Commission. Should an incident occur in which auxiliary systems become highly contaminated, any possible release of liquid effluents would be very deliberate and require coordination between TVA and other State and Federal agencies. Since there would be no need to release these liquid effluents to the environment immediately, this planning process may take several days and even months. Procedures specific to the situation would be developed at that time in conjunction with other authorities before release of the liquid.

Item c. It was TVA's intent that offsite monitoring teams would all use the same procedure provided in the Muscle Shoals Emergency Control Center (MSECC) implementing procedures. The procedures were not included in the emergency response kits for the plant teams as intended.

Item d. A procedure to provide internal tracking for this and other Radiological Emergency Plan (REP) commitments was in draft form at the time of the emergency preparedness appraisal but had not been formally implemented.

Corrective Steps Which Have Been Taken and Results Achieved

Item a. As a result of the letter dated March 19, 1981, from D. G. Eisenhut to H. G. Parris, the interim emergency operations facility is being replaced by the local recovery center as described in our submittal to H. R. Denton dated June 2, 1981. The Sequoyah Radiological Emergency Plan is being revised to reflect this change.

- Item b. TVA intends to provide "sole use" equipment as recommended by the auditor. This was provided on November 15, 1981.
- Item c. The procedure (MSECC-IPD, IP-9) has been placed in each emergency response kit at Sequoyah.
- Item d. A procedure for informing each plant of commitments and required performance dates has been developed. The tracking form was provided for NRC inspection. TVA contends that this tracking system will provide adequate notice to the plant of necessary drills and exercises. The radiological emergency planning coordinator has been designated at each plant to provide coordination for commitments involving the plant.

Corrective Steps Which Will Be Taken To Avoid Further Violations

- Item a. The local recovery center will not be staffed by TVA as part of the emergency response and therefore requires no procedures.
- Item c. A controlled copy of the MSECC-IPD which contains IP-9, Terrestrial Environmental Sampling Procedures has been assigned to the emergency response van and will be maintained in the van. Additionally, specific portions of IP-9 which apply to site boundary monitoring performed by the plant staff will be incorporated into SQN IP-14, Health Physics Procedure. Additional equipment required by IP-9 will be provided in the Sequoyah emergency response kits. Training will be provided on these procedures.
- Item d. The procedure has been issued for information and has been brought up to date on commitments. For every commitment made in the REP, the tracking system will alert the responsible organization 6-12 weeks in advance of the required performance date. If performance is not verified, automatic followups are made until verification is received.

Date When Full Compliance Will Be Achieved

- Item a. Full compliance was achieved on November 15, 1981.
- Item c. Full compliance was achieved on February 5, 1982. Incorporation of the new procedure was completed on February 5, 1982 and necessary training was completed on February 2, 1982.

ENCLOSURE 2
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO DEFICIENCIES
REVISED FINAL REPORT

1. Assessment Actions

Deficiency 50-327/81-20-12, 328/81-24-12

The planning standard in 10 CFR 50.47(b)(4) requires that a standard classification and emergency action level scheme, which includes facility and effluent parameters, be in use by the licensee.

The Sequoyah classification and emergency action level scheme was determined to be deficient in that there were no procedures available to relate radiation effluent monitor parameters to site boundary exposure rates in order to properly classify an accident condition in accordance with Procedure IP-1.

Deficiency 50-327/81-20-10, 328/81-24-10

The planning standard in 10 CFR 50.47(b)(9) requires that adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use by the licensee.

The Sequoyah methods and equipment for assessing and monitoring release of radioactive materials to the environment were determined to be deficient in that there was no procedure available to relate the Unit 1 high range Shield Building Vent Monitor to release rates of radioactive materials in order to assess offsite consequences of such releases, and there was no high range Shield Building Vent Monitor, nor procedure, provided for Unit 2 to assess releases of radioactive materials in an accident.

2. Emergency Organization

Deficiencies 50-327/81-20-01, 02; 328/81-24-01, 02

The planning standard of 10 CFR 50.47(b)(2) requires, in part, that the onshift facility licensee responsibilities for emergency response be unambiguously defined; 10 CFR 50, Appendix E, paragraph IV.A. requires, in part, that the onsite plant staff emergency response assignment be described in detail; and, the planning standard of 10 CFR 50.47(b)(15) requires that radiological emergency response training be provided to those expected to assist in an emergency.

The Sequoyah onsite organization for coping with emergencies is described in Section 4.0 of the Radiological Emergency Plan and Implementing Procedures IP-6 and IP-7. Training for the onsite emergency organization is addressed in Section 9.0 of the Radiological Emergency Plan.

The Sequoyah onsite emergency organization was determined to be deficient in that the organization had not been specified, in detail, down to the working level and the functional responsibilities of onsite personnel were not well defined below the supervisory level. Due to the lack of specific functional responsibility assignments, specific training in radiological response had not been provided to all emergency organization personnel.

Steps Which Have Been Taken

- Item 1. The SQN-IPD, I-1, Emergency Classification Logic, has been changed to provide for the classification of emergencies based upon radiological effluents. The procedure also provides the capability to estimate site boundary exposure rates based upon radiological effluents and worst case meteorology. The procedure utilizes the high- and low-range shield building vent monitors for both units. The unit 2 high-range shield building vent monitor has been installed and is fully operational.
- Item 2. TVA is comparing Sequoyah REP, Table 1, with NUREG 0654, Section IIB, Table B-1, to determine which specific functional responsibilities should be delegated down to the working level.

Steps Which Will Be Taken

- Item 1. This is a completed item.
- Item 2. Upon determination of specific responsibilities that should be delegated, TVA will make appropriate changes to the Sequoyah REP and plant procedures. Training in the specific responsibilities will be provided to assigned personnel.

Schedule for Completion of Actions for Each Item

- Item 1. This is a completed item.
- Item 2. Required changes to the Sequoyah REP and plant procedures as well as additional training were completed on February 5, 1982.