

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

NRC REGION II
ATLANTA, GEORGIA

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March 16, 1983

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

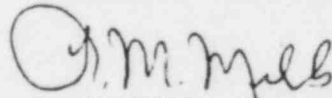
Dear Mr. O'Reilly:

Enclosed is our response to D. M. Verrelli's February 10, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-02, -260/83-02, -296/83-02 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation NRC regulations. We have enclosed our response to Appendix A, Notice of Violation. A two-day extension was discussed with and granted by F. Cantrell of your staff on March 14, 1983. 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

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ENCLOSURE
RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-02, 50-260/83-02, AND 50-296/83-02
D. M. VERRELLI'S LETTER TO H. G. PARRIS
DATED FEBRUARY 10, 1983

Appendix A

(259, 260, 296/83-01)

Technical Specification 6.3.A.4 requires that detailed written procedures including applicable check-off lists covering emergency conditions involving potential or actual release of radioactivity shall be prepared, approved and adhered to. Radiochemical Laboratory Manual, Sampling and Data Reduction Procedures, Section 728.III.2.1, Procedure for Sampling RHR Heat Exchangers requires that three liters of RHR Service Water in a Marinelli beaker is to be used for isotopic analysis.

Contrary to the above, on January 15, 1983, the licensee was not using a three liter sample of RHR service water in a Marinelli beaker for isotopic analysis, in that only a one liter sample (in a 1000ml sample bottle) was being used for isotopic analysis.

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

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

Liquid effluent samples of all types analyzed at Browns Ferry are routinely counted in either Marinelli beakers or one-liter bottles. However, the procedure used to analyze RHR service water samples specifically required the use of Marinelli beakers. At some time during the last two to three years, the laboratory supply of three-liter Marinelli beakers was depleted. Laboratory analysts substituted the use of the one-liter bottles in order to verify compliance with the technical specification release limits (3.8.A) for RHR service water during system operation. Substitution of the one-liter bottles for the three-liter Marinelli beakers had no adverse effect on the sample results since the laboratory counting equipment is calibrated for multiple geometries.

The radiochemistry laboratory manual procedure was not appropriately changed to reflect the substitution because of administrative inadequacies and personnel error. Apparently, no one was assigned or assumed the responsibility for following through on the problem. This also resulted in the failure to replenish the laboratory supply of Marinelli beakers.

3. Corrective Steps Which Have Been Taken and the Results Achieved

Radiochemical Laboratory Manual Procedure 728.III.2.1 (RHR Service Water Sampling) will be revised to allow for the use of either Marinelli beakers or one-liter bottles.

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

All radiochemical laboratory analysts will be required to read Browns Ferry Standard Practice 2.3 concerning the review, approval, use, and necessity of correcting discrepancies in plant instructions.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by April 15, 1983.