

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

USNRC REGION II
ATLANTA, GEORGIA

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May 23, 1983

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

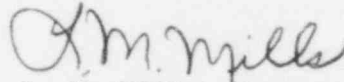
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' April 22, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-12, -260/83-12, -296/83-12 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

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-12, 50-260/83-12, AND 50-296/83-12
R. C. LEWIS' LETTER TO H. G. PARRIS
DATED APRIL 22, 1983

Item A - (259, 260, 296/83-12-02)

Technical Specification 6.3.D.1 requires that each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Special Work Permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the areas has been established and personnel have been made knowledgeable of them.
3. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Special Work Permit.

Contrary to the above, on March 23 and 24, 1983, personnel were observed on two occasions in licensee-controlled high radiation areas; one on the 546 elevation of the Radioactive Waste Building and one on the 565 elevation of the Unit 1 Reactor Building; without dose rate instruments, without an alarming integrating dose rate radiation monitor and not under the positive control of an individual qualified in radiation protection procedures who is equipped with a dose rate instrument.

Additionally, the high radiation area on the 565 elevation of the Unit 1 Reactor Building was not barricaded and conspicuously posted in that one side of the high radiation barrier and posting had been partially removed.

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

Clarification of Circumstances

TVA acknowledges that there were three circumstances involved in the above stated violation. The circumstances concerning elevation 565 of unit 1 reactor building and the lack of one side of a high radiation barrier are associated with the same event.

1. Admission or Denial of the Alleged Violation (Radioactive Waste Building)

TVA admits a violation occurred on elevation 546 of the radioactive waste building as stated.

2. Reasons for the Violation if Admitted

The employee on the 546 elevation of the radioactive waste building failed to properly follow procedure.

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

The employee was counseled by the Operations Section supervisor and was instructed to follow procedures. In addition, he was notified of the disciplinary steps which would be taken if any further violations occurred. The employee acknowledged his responsibility to properly use dose rate instrumentation.

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

Appropriate disciplinary action will be taken if the employee violates rules governing use of dose rate instruments.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on May 1, 1983 when the employee was counseled.

1. Admission or Denial of the Alleged Violation (Unit 1 Reactor Building)

TVA denies that a violation of Technical Specification 6.3.D.1 occurred in conjunction with the event on elevation 565 of the unit 1 reactor building. There were mitigating circumstances involved in this event.

A carpenter crew was modifying radioactive material boxes to comply with new packaging requirements within a roped-off radiation zone. A forklift was being used to handle the boxes, and to provide access for the forklift, part of the rope barrier had to be periodically taken down. The work crew had a dose rate instrument readily available to them at the work location, however, it was not in the radiation zone at

the time the NRC inspector viewed the work in progress. It was within approximately five feet of the zone where it had been placed to prevent it being damaged by the forklift that had been working in the zone.

The personnel performing the work had checked out a dose rate meter before any work, and the employee using the instrument had checked with health physics technicians to help ensure that he was using the instrument correctly. Upon entering the zone, a survey of the boxes to be worked on was made and the high radiation areas were identified.

The work crew stepped away from the high radiation areas when conditions permitted and work was performed with ALARA considerations in mind. During most of the work period, the dose rate meter was placed on the radioactive material boxes being modified and was only moved out of the zone when the forklift operation started for the protection of the instrument.

A health physics technician was present and monitoring operations when forklift operations took place and the rope barrier was temporarily removed. Every effort was made to comply with the special work permit requirements. The individuals were aware of the requirements to enter the high radiation area and were prepared to prevent unauthorized access into the area during times when the rope barrier was removed, thus direct surveillance as permitted by 10 CFR 20.202(c)(14) was in effect.

As a result of the above-related positive control actions, we do not believe a violation occurred due to the mitigating circumstances involved.

Item B - (259, 260, 296/83-12-04)

Technical Specification 6.3.A.7 states that detailed radiation control procedures . . . shall be approved and adhered to.

Contrary to the above, on March 23, 1983, a radioactive waste operator under the controls of SWP-01-R-01681 was inside a contamination zone without all the protective clothing specified in the aforementioned SWP and was observed chewing gum which is contrary to Browns Ferry RCI-1.E and RCI-1.4, respectively. A second individual was observed on March 24, 1983, inside a posted contamination zone without protective clothing specified on his SWP.

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

In the March 23, 1983 instance, the individual involved failed to follow existing plant procedures, resulting in the violation of SWP requirements.

In the March 24, 1983 instance, the reactor building operator under the controls of the SWP failed to follow the SWP requirements. Although the area was zoned as a contamination zone, the area had been decontaminated to below contamination zone limits. Health Physics had informed the individual of the status of the zone and that the barrier noting the area as a contamination zone was to be removed. The individual then entered the area before the barrier was actually removed.

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

Radiological incident reports were issued for each instance cited. The individuals responsible were instructed to observe radiological barriers and to adhere to procedural requirements.

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

In the March 23, 1983 instance, the individual involved was notified of the disciplinary steps that will be taken if further violations occur.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on May 1, 1983 when the employees involved received instructions concerning proper observation of radiological barriers.