

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

December 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

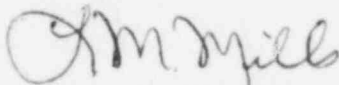
Dear Mr. O'Reilly:

Enclosed is our supplemental response to your November 23, 1983 letter to H. G. Parris regarding Inspection Report Nos. 50-259/83-03, -260/83-03, -296/83-03 for the Browns Ferry Nuclear Plant. Upon further evaluation we have concluded the violations (Items A and B) occurred as stated. The enclosure provides information as required by 10 CFR 2.201. 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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SUPPLEMENTAL RESPONSE - NRC INSPECTION REPORT NOS.

50-259/83-03, 50-260/83-03, 50-296/83-03

R. C. LEWIS' LETTER TO H. G. PARRIS

DATED MARCH 21, 1983

Appendix A

Item A (259, 260, 296/83-03-02)

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations of this part, and (2) are reasonable under the circumstances to evaluate the extent of the radiation hazards that may be present. Survey means an evaluation of the radiation hazards incident to the use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above, the licensee has failed to perform an evaluation of the radiation hazards to personnel indicated by significantly different personnel exposure results from the TLD and pocket dosimeter devices.

This is a Severity Level IV 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

As stated in the previous response, a computer program was being developed (March 1982 to December 1982) to provide reliable data for supporting TLD/DRD comparisons and subsequent investigations. During the period of March 1982 through December 1982, TVA performed monthly comparisons of TLD versus DRD data with the existing computer system.

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

Since the January 1983 implementation of the new health physics dose tracking system (HPDT), TVA has performed reviews of differences between TLD and DRD using the stated criteria (investigation, documentation, and corrective action for individual exposures exceeding 500 millirem per month with a difference greater than 25 percent between the TLD/DRD).

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

None.

5. Date When Full Compliance Will Be Achieved

TVA is in full compliance with NRC's interpretation of 10 CFR 20.201 as of January 31, 1983.

Item B (259, 260, 296/83-03-03)

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:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. 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 area has been established and personnel have been made knowledgeable of them.
- c. 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 Physics in the Special Work Permit.

Contrary to the above, on January 13, 1983, personnel were observed on two occasions in the Unit 2 drywell, which is a licensee-controlled high radiation area, without dose rate instruments, an alarming integrating dose rate radiation monitor, or under the positive control of an individual qualified in radiation protection procedures who is equipped with a dose rate instrument.

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

The engineers involved had read the requirements of the special work permit (SWP) and had a dose rate meter assigned to their crew. The engineers apparently separated while in the drywell when observed by

the NRC inspector. However, the engineers were of the opinion that they met the requirements of the SWP and Technical Specification 6.3.D.1 in that they were part of a group who did have a dose rate meter in their possession.

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

All Browns Ferry employees have been reminded by memorandum of their responsibilities relating to safe radiological control practices and compliance with SWPs. Employees have been notified that failure to adhere to safe radiological control practices may result in disciplinary action.

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

None required.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on April 12, 1983.