

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower M

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September 19, 1983

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

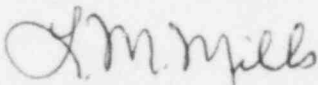
Dear Mr. O'Reilly:

Enclosed is our response to R. C. Lewis' August 19, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-25, -260/83-25, -296/83-25 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

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1983-TVA 50TH ANNIVERSARY

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RESPONSE - NRC INSPECTION REPORT NOS.  
50-259/83-25, 50-260/83-25, AND 50-296/83-25  
R. C. LEWIS' LETTER TO H. G. PARRIS  
DATED AUGUST 19, 1983

Appendix A

Item A - (259, 260, 296/83-25-01)

10 CFR 20.203(e) and (f) requires in part that each area or room in which licensed material is used or stored and which contains any radioactive material . . . in an amount exceeding 10 times the quantity of such material specified in Appendix C of this part be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION OR DANGER, RADIOACTIVE MATERIAL. Additionally, each container except as provided in 10 CFR 20.203(f)(3) shall bear a durable, clearly visible label identifying the radioactive contents. This label shall bear the radiation caution symbol and words: "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL." It shall also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

10 CFR 20.202(b)(2) states that, "Radiation Area" means any area, accessible to personnel, in which there exists radiation, originating in whole or in part within licensed material at such levels that a major portion of the body could receive in any one hour a dose in excess of 5 millirem, or in any 5 consecutive days a dose in excess of 100 millirems.

10 CFR 20.203(b) requires that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: "Caution, Radiation Area" or "Danger, Radiation Area."

Contrary to the above, a 55 gallon drum located outside the licensee's regulated area which had been there for longer than 24 hours, and reading 500 millirems per hour on contact with the drum and 5.5 millirem per hour 18 inches from the drum was observed on June 22, 1983. Neither the area containing the drum or the drum was identified by the licensee as containing radioactive material or being a radiation area.

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 Violations if Admitted

The drums involved were to be re-used for torus sand transport. The health physics technician who surveyed the external surfaces of the drums before removal from the turbine building breezeway was informed that the drums were to be placed in a radioactive material storage area on the south side of the reactor building. The teamster who transported the drums, however, placed them in an unzoned area on the south side of the reactor building near the residual heat removal service water tunnel 1A/1C.

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

Technicians surveying drums and equipment exiting the turbine building breezeway have been instructed to provide a health physics escort to ensure arrival at the designated location. No further problems involving material from this area have been encountered.

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

Health physics technicians have been instructed to escort radioactive material exiting all areas of the plant since the turbine breezeway is not the only source of such material.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Item B

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

Browns Ferry Radiological Control Instruction (RCI) - 1 requires that personnel performing whole body frisking shall pass the probe slowly over the surface of the body, keeping the probe 1 centimeter above the surface of the skin or clothing. RCI-1 also requires that known contaminated areas be posted as contamination zones.

Contrary to the above, radiation control procedures were not adhered to, in that: (1) On June 22, 1983, licensee personnel after exiting the Unit 1 Drywell did not perform whole body frisks as required by RCI-1. Whole body frisks were performed rapidly while holding the probe much greater than 1 centimeter above the surface of the skin; and (2) on June 23, 1983, the entrance to the Unit 1 Reactor Building

leading from the airlock between the Unit 1 and 2 Reactor Buildings was not posted as a contamination area as required by RCI-1.

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

Item B1 - (259, 260, 296/83-25-02)

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violations if Admitted

Licensee personnel violated Browns Ferry procedures by not performing an adequate whole body frisk. The reasons for these actions are attributed to the large number of employees working in the area and to the new employees gaining experience and knowledge of the sensitivity of the whole body frisker.

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

The power plant superintendent has issued a memorandum reminding all personnel of the proper procedure for personnel monitoring when exiting a contamination zone and a regulated area. The memorandum further states that deviation from required personnel contamination monitoring procedures will be handled in accordance with established plant procedures.

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

Additional friskers have been ordered to eliminate congestion and prevent delays to personnel. Health physics is evaluating frisk-all booths as a second alternative.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 31, 1983, when additional friskers will be received.

Item B2 - (259, 260, 296/83-25-03)

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violations if Admitted

The airlock door on unit 2, elevation 541, had been posted as a C-zone. The sign had fallen from the door or been removed as tape

marks were still evident in the same dimensions as the contamination sign. The NRC inspector found the sign missing before the health physics personnel made his tour.

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

The importance of proper posting and attention to details on plant tours has been emphasized to all health physics personnel to eliminate this problem in the future.

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

No further corrective action is required.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on August 1, 1983.