

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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April 10, 1984

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

Dear Mr. O'Reilly:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/84-04 AND 50-328/84-04 - RESPONSE TO VIOLATION

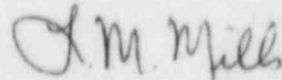
The subject OIE inspection report dated March 12, 1984 from R. C. Lewis to
H. G. Parris cited TVA with one Severity Level IV Violation. Enclosed is
the response to the item of violation in the subject inspection report.

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 Licensing

Enclosure

cc (Enclosure):

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

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ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.
50-327/84-04 AND 50-328/84-04
R. C. LEWIS'S LETTER TO H. G. PARRIS
DATED MARCH 12, 1984

Item 327, 328/84-04-01

Licensee Technical Specifications state in paragraph 6.11, Radiation Protection Program, that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Licensee procedure SQNP, RCI-14, Radiation Work Permit (RWP) Program, states in paragraph IIID that if an RWP Timesheet is posted at the area, Health Physics shall meet the requirements prescribed on the permit. RWP No. 02-01-00001, issued January 9, 1984, for repair of damaged track in the fuel transfer canal states obey all instructions on the RWP and do not exceed 250 mrem per day.

Contrary to the above, Timesheet No. 005 shows that during the period January 9 - 13, 1984, three individuals made four entries into the transfer canal in which they received exposures in excess of 250 mrem/day, ranging from 400 to 625 mrem.

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

During the period January 9-13, 1984, three individuals made three entries each into the transfer canal to do repair work associated with the fuel upender. Preplanned dose estimates were developed to limit the applicable workers to 250 mrem per day, and a radiation work permit (RWP) was issued which stated this limit. Contrary to the limit stated on the RWP, four entries resulted in exposures greater than 250 mrem.

Constant Health Physics coverage was provided for this work. Although Health Physics acknowledged the original dose limit was too low to complete the necessary job (and ensured the applicable workers were not exceeding any regulatory exposure limits), no attempt was made to issue another RWP with a less restrictive dose limit for that job.

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

- a. Health Physics has reviewed the practice of assigning prejob dose limits and has stressed the importance of accurate estimates.
- b. An aggressive plant-wide training program was developed which stressed several Health Physics aspects including RWP use and compliance.

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

- a. The use of and compliance with RWPs will be scrutinized by plant management to ensure compliance.
- b. A continuing effort to clarify plant procedures and to increase a worker-level understanding concerning the RWP is ongoing.

5. Date When Full Compliance Will Be Achieved

All corrective actions including the plant-wide training program were completed before March 1, 1984.