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August 4, 1995

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

10 CFR 2  
Appendix C

Gentleman:

|                            |   |                    |
|----------------------------|---|--------------------|
| In the Matter of           | ) | Docket Nos. 50-259 |
| Tennessee Valley Authority | ) | 50-260             |
|                            |   | 50-296             |

**BROWNS FERRY NUCLEAR PLANT (BFN) - NRC INSPECTION REPORT  
50-259, 50-260, 50-296/95-33 - REPLY TO NOTICE OF VIOLATION  
(NOV)**

This letter provides our reply to the subject NOV transmitted by letter from K. P. Barr, NRC, to O. D. Kingsley Jr., TVA, dated July 6, 1995. The NOV involved a failure of craft personnel to comply with a requirement in a Radiological Control Instruction. TVA admits this violation.

The enclosure contains our reply to the NOV. There are no commitments contained in this reply. If you have any questions, please contact Pedro Salas, Manager of Site Licensing, at (205)729-2636.

Sincerely,

R. D. Machon  
Site Vice President

Enclosure  
cc: See page 2

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Enclosure

cc (Enclosure):

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ENCLOSURE

TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT (BFN)  
UNITS 1, 2, AND 3

INSPECTION REPORT NUMBER 50-259, 50-260, 50-296/95-33  
REPLY TO NOTICE OF VIOLATION (NOV)

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RESTATEMENT OF VIOLATION

Technical Specifications section (§) 6.8.1 requires, in part, that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Revision (Rev. 2) dated February 1978.

Regulatory Guide 1.33, Appendix A states, in part, that radiation protection procedures including a Radiation Work Permit (RWP) system be developed for access control to radiation areas.

Radiation Control Instruction 9, Radiation Work Permits, Rev. 29, dated October 3, 1994, § 7.2 requires, in part, individual workers to read a RWP thoroughly prior to entering the area covered by that RWP.

Contrary to the above, on June 9, 1995, only one out of seven individuals preparing to enter the radiologically controlled area to perform work on the Unit 2 Residual Heat Removal Service Water (RHRSW) System was observed to thoroughly read RWP 95-2-0-01301 (Dose Control/DAD) Maintenance on RHRSW System (023).

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

TVA's REPLY TO THE VIOLATION

1. Reason For The Violation

This violation resulted from failure to follow procedure. Contrary to the requirements of Radiological Control Instruction (RCI) 9, craft personnel did not thoroughly read Radiation Work Permit (RWP) 95-2-01301 before signing on to it.

In this event, the foreman and craft personnel went to the Plant RADCON Laboratory for the RWP briefing. Initially, the craft foreman discussed the conditions of the RWP with a RADCON Lead Coordinator (RLC). Following this discussion, the RLC provided a copy of the dose tracking RWP for the foreman and the crew to read. The foreman read the RWP, and

made the crew aware that they were signing in on another dose tracking RWP. Because this crew had signed in on several previous similar dose tracking RWPs, they became desensitized and presumed that they understood the radiological conditions of this RWP<sup>1</sup>. As a result, only one crew member casually read the RWP, but the remainder of the crew did not.

Contributing to this violation was the failure of the foreman to ensure compliance with procedural requirements. RCI-9, step 7.3.3 requires that job supervisors/task leaders ensure subordinate personnel comply with the RWP.

When the NRC inspector observed the procedural violation, the NRC inspector made the RLC aware of the crew's failure to read the RWP thoroughly. The RLC then took corrective action to prevent the crew members from entering the radiologically controlled area.

## **2. Corrective Steps Taken And Results Achieved**

As a result of this violation, TVA's Nuclear Assurance and Licensing organization performed an independent followup field assessment of radworker knowledge of RWPs. Based on the results of this assessment, TVA concluded that supervisors were not always familiar with the radiological conditions of the RWPs before sending their crews into the Radiological Control Area, and individuals were not familiar with the radiological requirements of the RWP before signing in on the RWP and entering their work area. TVA also concluded that supervisors and individuals were not familiar with the general area radiation levels, contaminated levels, and whole body dose rates for their RWPs.

As a result of this assessment and the violation, TVA took appropriate corrective action with the crew members, including the foreman. TVA conducted site-wide briefing sessions to discuss this event and resensitize BFN personnel to the need to read and understand the radiological conditions for their assigned RWPs. TVA also issued a Site Bulletin to address the responsibilities of the individuals and job supervisors/task leaders when using RWPs.

TVA reinforces radiation worker responsibilities and the purpose of RWPs in General Employee Training. During this training, TVA emphasizes to the radiation workers the need to read and understand RWPs prior to entering the RCA.

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<sup>1</sup>The previous dose tracking RWPs had identical radiological requirements, entry dose limits, and digital alarming dosimeter alarm setpoints. Essentially the only differences between these previous RWPs and RWP 95-2-01301 were the work location and job description.



As an enhancement, TVA revised Radiological Control Instruction-9.1, "Radiation Work Permit Preparation and Administration," to guide the activities of the RLC when processing individuals on an RWP. Specifically, the revision requires RADCON personnel to receive acknowledgement that the radiation workers have reviewed the RWP requirements.

3. Corrective Steps That [Have Been Or] Will Be Taken To Prevent Recurrence

No additional corrective actions are necessary.

4. Date When Full Compliance Will Be Achieved

TVA is in full compliance.