

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

83 DEC 12 1983
December 9, 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' November 9, 1983 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/83-38, -260/83-38, -296/83-38 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. In our response to Item A, we request your reevaluation of that violation based upon the information submitted. 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

ENCLOSURE

RESPONSE - NRC INSPECTION REPORT NOS.
50-259/83-38, 50-260/83-38, AND 50-296/83-38
RICHARD C. LEWIS' LETTER TO H. G. PARRIS
DATED NOVEMBER 9, 1983

Appendix A

Item A (259, 260, 296/83-38-02)

10 CFR 20.203(f) requires, except as provided in 10 CFR 20.203(f)(3), that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. This label shall bear the radiation caution symbol and the 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.

Contrary to the above, a closed 55 gallon drum which read 30 to 65 millirem per hour on contact was observed unlabeled on September 13, 1983, on the 565 elevation of the Unit 1 Reactor Building.

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

1. Admission or Denial of the Alleged Violation

TVA admits the incident occurred as stated; however, because of extenuating circumstances, we request NRC reconsider issuance of the violation and the severity level.

2. Reasons for the Violations if Admitted

On September 13, 1983, as a documented ALARA action, three 55-gallon drums of radioactive material were removed from the unit 1 reactor building, elevation 565, A and C heat exchanger room. At 1330 on September 13, 1983, two health physics management representatives inspected the unit 1 reactor building, elevation 565. At that time the three 55-gallon drums were still in the A and C heat exchanger room. At 1630 on September 13, 1983, an NRC inspector and a health physics technician noted one of the three 55-gallon drums outside the A and C heat exchanger room in an unmarked condition. 10 CFR 20.203(f)(3)(iv) exempts a container from marking, provided it is attended in such a manner that personnel are not exposed to radioactive material to the extent that 10 CFR 20.101 exposure limits are exceeded. The NRC inspector was provided documentation that continuous health physics coverage was being provided to the unit 1 reactor building elevation 565 for the principal purpose of monitoring movement of radioactive material out of contamination zones. Additionally, a second health physics technician was providing job coverage for the drum removal and

was either inside the A and C heat exchanger room or escorting the other drums to a storage location. With administrative dose limits providing a buffer, it would have been extremely difficult or impossible to construct a situation where legal dose limits could have been exceeded. Thus the unmarked drum could be considered to be exempted by the criteria of 10 CFR 20.203(f)(3)(iv). Based on the circumstances, it is requested that issuance of this violation be reconsidered.

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

A copy of the inspection report has been distributed to health physics personnel.

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

This is considered to be a random event which could have been considered to be in compliance with 10 CFR 20.203(f)(3)(iv). No further steps are planned.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Item B (259, 260, 296/83-38-03)

Technical Specification 6.3.A.7 requires that detailed radiation control procedures . . . shall be prepared, approved and adhered to. Browns Ferry Radiological Control Instruction (RCI)-1 prohibits eating, drinking, smoking or chewing inside a regulated area. RCI-1 requires that personnel exiting a contamination zone perform a whole body frisk and shall pass the probe slowly over the surface of the body, keeping the probe one centimeter above the surface of the skin or clothing.

Contrary to the above, radiation control procedures were not prepared or adhered to, in that:

- (1) Browns Ferry RCI-5, dated August 10, 1982, has not been updated to reflect the current changes to 49 CFR regarding the transportation of radioactive material, especially regarding dose rate limits associated with vehicles and packages. Browns Ferry has made several radioactive material shipments per week since the new requirements went into effect July 1, 1983. The existing procedure was not adhered to in that the present procedural limits contradict the revised 49 CFR requirements.

- (2) On September 15, 1983, two licensee employees were observed on the 565 elevation of the Unit 1 Reactor Building performing excessively rapid whole body frisks while holding the detector probe approximately two to six inches from their body.
- (3) On September 14, 1983, a licensee guard was observed chewing gum in a regulated area of the Unit 2 Reactor Building 565 elevation. On September 15, 1983, a GAPCO employee was observed chewing candy in the regulated area of the Unit 1 Reactor Building 565 elevation.

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 Violations if Admitted

Licensee personnel failed to incorporate the 49 CFR changes to RCI-5 in a timely manner due to an administrative oversight.

3. Corrective Steps Which Have Been Taken and Results Achieved

RCI-5 was revised to incorporate the 49 CFR changes. TVA is presently evaluating its method for incorporating CFR changes into corporate-level and plant-level procedures and will provide a follow-up report by April 1, 1984.

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

Additional corrective steps are dependent on the result of our study.

5. Date When Full Compliance Will Be Achieved

Full compliance regarding the violation has been achieved.

Item B(2)

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 Nuclear Plant procedures by not performing adequate whole-body frisks.

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

Administrative actions in accordance with plant procedures were taken against the individuals involved.

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

None.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved with administrative action.

Item B(3)

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 Nuclear Plant procedures by entering plant regulated area with gum and candy in their mouth.

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

Administrative actions in accordance with plant procedures were taken against the individuals involved.

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

None.

5. Date When Full Compliance Will Be Achieved

Full compliance has been achieved with administrative action.