

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

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July 30, 1984

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

Enclosed is our response to J. P. O'Reilly's June 28, 1984 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/84-19, -260/84-19, -296/84-19 regarding activities at our Browns Ferry Nuclear Plant which appeared to have been in violation of NRC regulations. We have enclosed our response to the 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

L. M. Mills, Manager
Nuclear Licensing

Enclosure

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RESPONSE
NRC INSPECTION REPORT NOS.
50-259/84-19, 50-260/84-19, AND 50-296/84-19
J. P. O'REILLY'S LETTER TO H. G. PARRIS
DATED JUNE 28, 1984

Enclosure

Item 1 - 259/260/296/84-19-01

10 CFR 71.5(a) requires that each licensee, who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the regulations appropriate to the mode of transport of DOT in 49 CFR Parts 170 through 189.

49 CFR 173.425(b)(6) requires that packaged radioactive material shipments must be braced so as to prevent shifting of lading under conditions normally incident to transportation.

Contrary to the above, upon arriving at the destination on April 10, 1984, a box of low specific activity radioactive waste shipped under control number BSMP 84-20 on April 4, 1984, was discovered to have shifted during transport.

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

1. Admission or Denial of the Alleged Violation

TVA admits the alleged violation as stated.

2. Reasons for the Violations

49 CFR 173.425(b)(6) states in part, "shipments must be braced so as to prevent shifting of lading." On a shipment to U.S. Ecology (84-20), a small box was placed on top of larger boxes and braced, as was evidenced by photos taken before shipment was released. Apparently the bracing was inadequate for the 2,200-mile road trip to the burial site. The plant had no criteria for consistently specifying the minimum amount of bracing required for cross-country transport.

3. Corrective Steps Which Have Been Taken and Results Achieved

Effective April 26, 1984, all shipments involving double-stacked boxes or drums receive more extensive lateral blocking and bracing.

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

A technical procedure will be revised with sketches which will detail types of acceptable blocking and bracing.

5. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by August 22, 1984.