



Tennessee Valley Authority, P.O. Box 2000, Soddy-Daisy, Tennessee 37379

J. L. Wilson
Vice President, Sequoyah Nuclear Plant

November 3, 1992

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

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket Nos. 50-327
50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC INSPECTION REPORT NOS. 50-327,
328/92-25 - RESPONSE TO NOTICE OF VIOLATION (NOV) 50-327, 328/92-25-01

Enclosure 1 contains TVA's response to William E. Cline's letter to M. O. Medford dated October 5, 1992, which transmitted the subject NOV. This violation concerned a failure to follow procedures and control hazardous materials that could result in radiological hazards. TVA's response includes actions taken to ensure that chemicals brought into radiologically controlled areas are properly controlled and will not present a hazardous condition to plant personnel or equipment.

Enclosure 2 contains a summary of commitments made in this submittal.

If you have any questions concerning this submittal, please telephone M. A. Cooper at (615) 843-8924.

Sincerely,

J. L. Wilson

Enclosures
cc: See page 2

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cc (Enclosures):

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ENCLOSURE 1

RESPONSE TO NRC INSPECTION REPORT
NOS. 50-327/92-25 AND 50-328/92-25
WILLIAM E. CLINE'S LETTER TO MARK O. MEDFORD
DATED OCTOBER 5, 1992

Violation 50-327, 328/92-25

"Technical Specification (TS) 6.8.1 requires written procedures shall be established, implemented, and maintained covering the activities referenced in Appendix 'A' of Regulatory Guide 1.33, Revision 2, February 1978. Appendix 'A' Paragraph 10, of Regulatory Guide 1.33 requires the use of control procedures for chemicals to minimize the risk of radiological hazards.

"Procedure SSP.7, [sic] Revision 7, Appendix A, 'Housekeeping Temporary [sic] Equipment Control,' checklist items 9 and 17, require controlling flammable combustible material.

"Procedure SSP-13.2, Revision 4, 'Chemical Traffic Control (CTC) Program,' Paragraph 3.3.6 requires new containers be marked if chemicals are transferred from original containers.

"Contrary to the above, the licensee failed to follow administrative procedures in that during the week of August 24-28, 1992, the licensee did not label or properly control numerous containers of hazardous materials which could result in radiological hazards.

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

Reason for the Violation

There are three reasons for the violation of failing to follow procedures.

First, craft had been trained on general Chemical Traffic Control (CTC) program requirements, but the training had not been craft specific. The craft did not always correlate transferring chemicals, i.e., greases, oils, cleaners, paints, and paint thinners, into unlabeled containers and storing these containers in radiologically controlled areas (RCAs) with the hazardous materials and control of hazardous materials that were mentioned in the CTC training. Therefore, the craft left unlabeled containers and unused chemicals in the RCAs.

Second, immediate management, i.e., foremen, general foremen, and engineers, did not enforce the CTC program requirements associated with labeling and storage of chemicals.

Third, supervisors of sections using chemicals were not performing routine inspections of their work areas to ensure compliance with the CTC program requirements. These routine inspections are requirements in the CTC program procedure, Site Standard Practice (SSP) 13.2, "Chemical Traffic Control (CTC) Program."

Corrective Steps That Have Been Taken and Results Achieved

NRC inspectors reported that unlabeled chemicals and containers were stored in the auxiliary building on Elevation 690 on August 24, 1992. Subsequent inspections on other elevations by Radiological Control personnel revealed additional discrepancies, however, on a much smaller scale.

The unlabeled chemicals and containers were carried into the RCAs by various site organizations. However, most appeared to be associated with an ongoing painting activity under Modifications' responsibility. Modifications' supervisors promptly directed that all known chemicals under Modifications' control be brought out of the RCA and properly labeled or appropriately disposed of. Radiological Control supervisors and personnel performed similar cleanup and removal of chemicals under their control. Modifications' craft personnel were immediately retrained on the CTC program requirements as they apply to each craft discipline. Craft-specific training for CTC controls was also provided for the Chemistry, Maintenance, Technical Support, and Operations sections.

The foremen and engineers involved in the activities responsible for the CTC violations have been counseled for their lack of implementation and enforcement of the program requirements. Section supervisors have begun performing routine inspections of their work areas to ensure that chemicals are properly controlled.

Corrective Steps That Will be Taken to Avoid Further Violations

SSP-13.2, "Chemical Traffic Control (CTC) Program," and SSP-13.3, "Environmental Compliance," will be revised to specifically address disposal of unused material and used containers with residues. The revision will also address the removal of unused material and containers from the RCA.

Site Quality will initiate a surveillance activity of the CTC program.

Date When Full Compliance Will be Achieved

TVA is in full compliance.

ENCLOSURE 2

Commitments

1. The Site Quality organization will initiate a surveillance activity of the Chemical Traffic Control program. This will be accomplished by November 9, 1992.
2. Site Standard Practice (SSP) 13.2, "Chemical Traffic Control (CTC) Program," and SSP-13.3, "Environmental Compliance," will be revised to specifically address disposal of unused material and used containers with residues. This will be accomplished by March 1, 1993.