

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

June 12, 1985

U.S. Nuclear Regulatory Commission  
Region II  
ATTN: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT  
50-327/85-15 AND 50-328/85-15 - RESPONSE TO VIOLATION

Enclosed is our response to D. M. Verrelli's April 30, 1985 letter to  
H. G. Parris transmitting IE Inspection Report Nos. 50-327/85-15 and  
50-328/85-15 for our Sequoyah Nuclear Plant which cited TVA with one Severity  
Level V Violation.

If you have any questions, please get in touch with R. E. Alsup 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

*J. A. Domer*  
J. A. Domer, Chief  
Nuclear Licensing Branch

Enclosure

cc: Mr. James Taylor, Director (Enclosure)  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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RESPONSE - NRC-OIE INSPECTION REPORT NOS.  
50-327/85-15 AND 50-328/85-15  
D. M. VERRELLI'S LETTER TO H. G. PARRIS  
DATED MAY 13, 1985

Items 50-327/85-15-02 and 50-328/85-15-02

Technical Specification Table 4.11-2 requires the analysis of Xe-138 in gaseous waste samples at a Lower Limit of Detection (LLD) of 1E-04 microcuries per cc.

Contrary to the above, during the period June through December 1984, there were numerous examples of failure to achieve the required LLD for Xe-138 due to excessive decay time between sampling and analysis.

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

1. Admission or Denial of the Alleged Violation

TVA denies this violation as stated.

2. Reasons for the Denial of Violation

The cited examples stated that TVA did not meet LLD requirements for Xe-138 for waste gas decay tank batch releases. By administrative procedures, a batch is to be sampled and analyzed before the release is made, and the tank must be isolated to prevent additions of gas to ensure the sample is representative. Because of these administrative procedures, a representative sample of the tank will represent the contents of the tank regardless of the time between when the sample was taken and when the sample was counted. That is, the sample will decay at the same rate as the gas in the tank. Therefore, if there is no Xe-138 present when the sample is analyzed there will be no Xe-138 present in the release. All continuous releases (i.e., containment vents and purges) examined during this inspection were found to have been analyzed in a timely manner that met LLD requirements for Xe-138.

TVA does agree that procedures did not clearly identify required counting times to ensure LLD's were met, but there were no cases identified where technical specification requirements were not met. The LLD's for effluent releases, liquid and gaseous, have been reevaluated for all three of Sequoyah Nuclear Plant's gamma spectrometry systems. The technical instruction TI-12, "Radiological Analytical Methods," which describes counting methods, i.e., volumes, efficiency files, counting times, etc., has been revised to reflect minimum time periods between sample collection and counting times in order to meet Technical Specification LLD requirements Table 4.11-2. If these times cannot be met, analysts have been instructed to resample.