

40-1341

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
1630 Chestnut Street Tower II

RETURN ORIGINAL TO PDR, HQ.

June 28, 1985

Mr. R. Dale Smith
U.S. Nuclear Regulatory Commission
Uranium Recovery Field Office
P.O. Box 25325
Denver, Colorado 80225

Dear Mr. Smith:

EDGEMONT DECOMMISSIONING PROJECT - NRC - URANIUM RECOVERY FIELD OFFICE
(URFO) INSPECTION REPORT 40-1341/85-001 - RESPONSE TO VIOLATIONS

The subject inspection report cited TVA with three Severity Level IV violations (1341/85-001, 1341/85-002, 1341/85-004) and a Severity Level V violation (1341/85-003) in accordance with 10 CFR 2.201. Enclosed is our response to the subject violations.

If you have any questions, please get in touch with D. L. Lambert at FTS 858-2733.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. H. Shell

R. H. Shell
Nuclear Engineer

Enclosures

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PDR ADOCK 04001341
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DESIGNATED ORIGINAL

Certified By *Mary C. Hood*

Enclosure

Edgemont Decommissioning Project
NRC-URFO Inspection Report

40-1341/85-001, 40-1341/85-002, 40-1341/85-003, And 40-1341/85-004

Severity Level IV - Violation 40-1341/85-001

License Condition 31 requires, in part, adherence to Special Work Permit requirements (protective clothing) if the employee performs nonroutine work in a contaminated area. License Condition 31 also requires, in part, that employees receive 4-hours of radiation training prior to working in a controlled area. License Condition 31 also requires that the existing property fence, a 6-foot high, anti-climb fence, topped with three strands of barbed wire, be altered to provide positive control and delineate the boundary between the uncontrolled and controlled areas.

Contrary to these requirements:

1. Two contractor employees failed to adhere to the Special Work Permit requiring the use of protective clothing before entering and working in a contaminated area on June 14, 1984.
2. One incompletely trained contractor employee was assigned work in the controlled area on May 30, 1984.
3. The licensee failed to maintain a secured facility. The integrity of the fence had been compromised in one area west of Pond 7, one area west of Sand Tailings Area A, and in several areas where the barbed wire was slack for an undetermined period of time.

Admission or denial of the alleged violation

1. TVA admits the incident occurred, but circumstances do not warrant a violation.
2. TVA admits the violation occurred.
3. TVA admits the violation occurred.

Reasons for the violation

1. On June 14 1984, slime materials were being excavated from Pond No. 7 for use in the Materials Handling Trial. The weight of the excavator and the associated vibration caused the slimes to partially liquify and the excavator began sinking. The employees, one being the Operations Supervisor, were immediately summoned to the site to direct and participate in efforts to salvage the equipment. In their reaction to the emergency situation, neither put on the necessary protective equipment.

2. The employee was directed to work on the Dust Control Facility and the Pond 10 modifications. The supervisor failed to recognize the employee's untrained status.
3. Disruption of the fence integrity resulted from (1) a deadfall across the fence west of Pond 7; (2) in a construction area where a support facility water line crossed the security fence, the fence was opened for construction equipment and then inadequately closed; and (3) west of area A, 55-gallon drums were placed along the exterior of the fence.

Corrective steps taken and results achieved

1. Both individuals were informed and counseled about the incident, but the discussion was not documented. Incidents of this type will be documented in the future. Additionally, discussions of the incident with the employees, subsequent training, and appropriate disciplinary actions taken commensurate with the incident will be documented.
2. The supervisor and employee were reported in writing to the Resident Manager. The Resident Manager explained the seriousness of the incident to the individuals, but did not document the discussion. There has been no recurrence of this type incident since that time.
3. On April 18, 1985, the deadfall was removed from the fence and the fence repaired. By May 1, 1985, the fence had been tightened in the appropriate areas and the 55-gallon drums had been removed.

Corrective steps taken to avoid further violations

1. Movement of the equipment over the slimes was a one-time operation for the Materials Placement Trial and will not be repeated. All operations personnel have been counseled on radiological safety requirements and the necessity to abide by all required procedures prior to entering the controlled area.
2. Should further incidents of this type occur, written documentation will be obtained of the incident, supplemental training will be provided, and appropriate disciplinary actions will be taken commensurate with the incident.
3. A documented weekly inspection program was initiated by the operator on May 1, 1985.

Date when full compliance will be achieved.

On all three items TVA is in full compliance.

Severity Level IV - Violation 1341/85-002

License Condition 24 requires, in part, submittal of a semiannual report summarizing any changes in land and water use and also, summarizing the licensee's inspections and audits.

Contrary to this requirement, semiannual reports were not available for the inspector's review at the time of the inspection for the period April 6, 1983 to April 26, 1985. Reports had not been submitted to the Uranium Recovery Field Office.

Admission or denial of the alleged violation

TVA admits the violation occurred as stated.

Reasons for the violation

- (a) Land and water use - There had not been any significant changes in land and water use around the existing mill or disposal site during the previous reporting periods. Because of this lack of activity, this information was inadvertently omitted from the reports.
- (b) Audits and Inspections - TVA conducted a radiological audit during 1984. A summary of this audit was not included in the semiannual report.

Corrective steps taken and results achieved:

On May 21, 1985, the responsible TVA organization was instructed to supply the necessary data in future semiannual reports.

Date when full compliance will be achieved:

Next semiannual report.

Severity Level V - Violation 1341/85-003

Title 10 CFR Part 20, Section 203(e)(2), required, in part, that each area in which natural uranium or thorium is stored in any amount exceeding 100 times the quantity specified in Appendix C of Part 20, shall be conspicuously posted with signs bearing the radiation caution symbol and the words "CAUTION - RADIOACTIVE MATERIALS."

Contrary to this requirement, several radiation caution signs had been rendered partially illegible by bullet holes.

Admission or denial of alleged violation

TVA admits the violation occurred.

Reason for the violation

Several of the radiation caution signs had been riddled with bullet holes which left them partially illegible.

Corrective steps taken and results achieved

The signs which were not readable were replaced on April 18, 1985. As part of our documented weekly security fence inspection program, all posted signs are checked and those not legible are replaced.

Date when full compliance will be achieved:

TVA is in full compliance.

Severity Level IV - Violation 1341/85-004

License Condition 14 requires, in part, that 3-5 discrete sediment samples be collected in transects at several locations across the breadth of the creek and river. License Condition 14 also requires, in part, that environmental TLDs be exchanged on a quarterly basis. License Condition 14 also requires, in part, that analyses of certain trace metals in sediment samples be conducted semiannually.

Contrary to these requirements:

1. The licensee failed to collect and analyze discrete sediment samples during the period of April 6, 1983, to October 31, 1984.
2. The licensee failed to exchange environmental TLDs on a quarterly basis during the period from April 1, 1984, to September 30, 1984.
3. The licensee failed to conduct trace metal analysis of the sediment samples during the period from April 6, 1983, to April 30, 1984.

Admission or denial of alleged violation:

TVA admits the violation occurred as stated.

Reasons for the violation:

1. Sampling instructions supplied to the operator were in error with the above-stated requirements.
2. TLDs required for implementation of the change at the scheduled time were not available. Because of the use of redundant TLDs, one TLD covered the middle increment even though the changeout period was missed, no data was lost.
3. Trace metal analyses were to be split samples of the radiological samples. These splits were not obtained which resulted in the omission of the trace metal analyses.

Corrective steps taken and results achieved

1. The operator has been instructed on sampling procedures consistent with those required by the FES. The first sediment samples for the next reporting period will be taken using these procedures.
2. TVA has implemented a tracking system to ensure that replacement TLDs are available on the schedule need dates.
3. Samples obtained since 1984 have been split and trace metal analysis performed.

Corrective steps taken to avoid further violations

1. On May 22, 1985, TVA supplied the operator with a letter confirming that the FES sampling protocol is to be followed.
2. TVA has implemented a tracking system to ensure that replacement TLDs are available on the schedule need dates.
3. On May 22, 1985, the correct sampling procedure was formalized in a written communication to the operator.

Date when full compliance will be achieved

1. Next semiannual report.
2. TVA is now in full compliance.
3. TVA is now in full compliance.