

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority  
Sequoyah

Docket Nos. 50-327 and 50-328  
License Nos. DPR-77 and DPR-79

The following violations were identified during an inspection conducted on May 20-24, 1985. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 20.311(d)(1) requires that licensees who generate and transfer radioactive waste to a land disposal facility shall prepare all wastes so that the waste is classified according to 10 CFR 61.55.

10 CFR 61.55(a)(8) states that the concentration of a radionuclide may be determined by indirect methods such as use of scaling factors which relate the inferred concentration of one radionuclide to another that is measured if there is reasonable assurance that the indirect methods can be correlated with actual measurements.

Contrary to the above, the licensee did not have reasonable assurance that the scaling factors used to determine radioactive waste classification during the period May 22, 1984 to May 24, 1985, correlated with actual measurements in that:

- a. Generic scaling factors were used to determine waste stream nuclide concentrations which were nonconservative for 65 percent of nuclides thus inferred, with 20 percent of those being nonconservative by greater than a factor of ten, when compared to the actual waste stream sample measurement.
- b. Only one set of scaling factors was used to determine the waste classification of all of the facility waste streams and actual sample analysis showed that at least four distinct waste streams existed at the facility.

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

2. 10 CFR 20.203(f) requires that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. The label shall bear the radiation caution symbol and the words "Caution or Danger - Radioactive Material." The label 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.

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Contrary to the above, containers of licensed material were observed not labeled as follows:

- a. On May 20, 1985, seven B45 metal boxes containing contaminated pump parts, oil and other equipment, and 12 drums containing radioactive material in the storage area outside of the Unit 1 containment were not labeled.
- b. On May 20, 1985, numerous bags containing contaminated tools and other equipment in the equipment decontamination room on 690 elevation of the auxiliary building were not labeled.
- c. On May 21, 1985, the bins containing laundered protective clothing on the 690 elevation of the auxiliary building were not labeled.
- d. On May 21, 1985, seven bags and one metal box containing radioactive waste on the refueling floor were not labeled.
- e. On May 22, 1985, a yellow poly bag containing contaminated steam generator headsets laying on top of Health Physics Locker No. 3 in the Unit 1 penetration room was not labeled.

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

3. Technical Specification 6.11 requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be adhered to for all operations involving personnel radiation exposure.

Licensee procedure RCI-3, Revision 17, Personnel Monitoring, paragraph IX requires that TLD badges and dosimeters be worn on the front of the person and between the neck and waist. The badges shall be placed in a plainly visible position and the identification number side of the badge shall always face away from the body.

Contrary to the above, procedures for personnel radiation protection were not adhered to in that during an approximate 15 minute period on May 21, 1985, 34 of the approximately 200 (17 percent) persons observed at the 690 elevation entrance to the auxiliary building were not properly wearing their TLD badges and dosimeters.

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

This violation is similar to violation 50-327/84-21-01 and 50-328/84-22-01 issued on September 17, 1984.

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: JUN 20 1985