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TENNESSEE VALLEY AUTHORITY

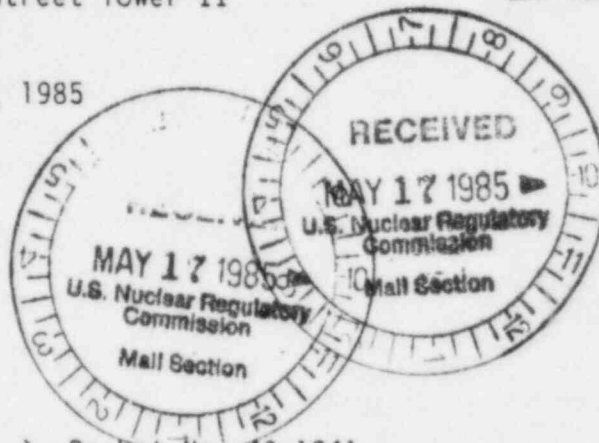
CHATTANOOGA, TENNESSEE 37401
1630 Chestnut Street Tower IIRETURN TO ~~██████████~~, P.O.

May 13, 1985

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

Dear Mr. Smith:

In the Matter of
 Tennessee Valley Authority



) Docket No. 40-1341
)

On April 18, 1985, a Nuclear Regulatory Commission exit interview was conducted by Mr. Shopenn of your office at the Edgemont site. One of his overriding concerns was apparently his interpretation that TVA did not have an adequate quality control program for the decommissioning project. In an effort to address this concern, enclosed is TVA's quality control program. It must be noted that the Uranium Operations Branch personnel are presently, in conjunction with Silver King Mines, Inc. (SKM), preparing a detailed construction quality control program. This program will be available on site, and will reaffirm TVA's and SKM's commitment to construction using best management practices.

If you have any questions or comments concerning this matter, please get in touch with W. M. Belvin of my staff at FTS 858-2693 in Chattanooga.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Homer
 J. W. Hufham, Manager
 Licensing and Regulations

Enclosure

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Certified By Mary C. Hood

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OPERATIONAL QUALITY CONTROL

TVA's Office of Nuclear Power (ONP) and its Uranium Operations Branch (UOB) of TVA's Division of Nuclear Services maintains an office in Casper, Wyoming. ONP plans and manages the nuclear energy supply programs to meet the requirements of the nuclear power program consistent with social, environmental, economic safety, and quality objectives. The Uranium Administration Branch (UAB) is responsible for activities related to acquiring an adequate supply of uranium concentrates including scheduling for TVA production. The branch represents the office in discussions related to procurement of nuclear fuel materials with other TVA organizations, producers, vendors, and supply and service organizations. It determines, coordinating with other organizations, the timing and scope of requisitions for uranium procurement and related services. UOB is responsible for TVA uranium operations and for monitoring and evaluating contractors' activities for compliance with the technical aspects of plans and budgets approved by TVA; approves changes in contractors' plans that do not increase the total scope of expenditures; and approves subcontracts where TVA reserved such right. It coordinates exploration, mining, and milling activities with other TVA organizations which have a program interest in them. One of the functions of UOB staff is to ensure that the Edgemont Mill Decommissioning Plan is properly implemented. A full-time TVA representative is on site during key decommissioning activities at both the existing mill site and the disposal site. Key decommissioning activities consist of, but are not limited to, clay perimeter liner, the clay cap, the containment dam foundation core and drains, the riprapped drainage channels and the riprapped downstream slope of the containment dam, the evaporation pond, placement of building rubble and radiological site cleanup activities. Therefore, UOB is responsible for the Edgemont Mill Decommissioning Operation Quality Control Program.

Testing and inspection during construction is to be conducted by the operator, Silver King Mines, Inc. (SKM). TVA, however, as the licensee, has the responsibility for assuring that prudent construction practices are followed and that testing and inspection are diligently and effectively performed. TVA decommissioning project representatives visit the site on a frequent, irregular, and sometimes unannounced basis to examine onsite material handling and construction operations. The project representative observes operations, checks for the presence of inspection personnel, and documents those observations. On the same basis, a decommissioning project representative visits the onsite soils testing laboratory to observe tests in progress and other activities of the geotechnical personnel.

Written and documented observations of decommissioning project activities are routed to TVA management and become a part of the project records. If evidence of substandard operator, inspector, or technician performance is presented, immediate corrective action is initiated with SKM. Appropriate documentation of such action is maintained in the project records. As part of the overall quality control program, SKM is required to submit weekly reports documenting the frequency and type of in-situ and laboratory tests and analyses performed during each week. All project records defined as contractual or quality assurance records, pursuant to Titles 10 and 41 of the Code of Federal Regulations, are maintained as U.S. Federal records.

RADIOLOGICAL SAFETY QUALITY CONTROL

TVA's ONP and its Radiological Health Staff (RHS) plan, develop, and interpret policy for radiation protection and control programs for TVA activities where radiation and radioactive materials are used. It evaluates the adequacy of the implementation of radiation protection programs involving radiation, evaluates plans for proposed and modified nuclear facilities, and recommends changes as appropriate. It provides direct support in all areas of health physics to the operating nuclear plants. It defines and conducts the environmental radioactivity monitoring programs around and environmental radiological assessments for TVA nuclear facilities. It defines personnel dosimetry programs and provides support services and assessment of personnel exposures. It provides centralized laboratory services and support to environmental and workplace monitoring; and it evaluates, develops specifications for purchases, and maintains portable radiation monitoring equipment used in TVA facilities. It provides health physics services to users of radiation in TVA as appropriate.

Edgemont mill decommissioning project management and employees are taking all reasonable precautions in the performance of the project to protect the health and ensure the safety of the employees and the public.

TVA's radiation protection requirements are defined in the Edgemont Decommissioning Health Physics Manual (HPM). SKM is required by contract to implement the program as defined in the HPM. RHS monitors the work activities of SKM, provides assistance as necessary, reviews procedural, operational, and radiological aspects of the work conducted by SKM to ensure effective implementation of the HPM. Additionally, annual independent oversight reviews and evaluations of the radiological protection programs are accomplished by TVA's Policy and Technical Assistance Staff of RHS. RHS also performs routine environmental analyses and occupational radiological dose assessment for the Edgemont Decommissioning Project.

ENVIRONMENTAL QUALITY CONTROL

TVA's Office of Natural Resources and Economic Development (ONR) and its Environmental Quality Staff (EQS) provide environmental policy interpretation and guidance to offices and divisions and advise the General Manager and Board of Directors on environmental standards and policy. It is the agency point of contact with external environmental protection authorities including the Council on Environmental Quality, Environmental Protection Agency, and State and local regulatory agencies for environmental clearances, permits, regulatory interfaces, and reports. It maintains contact with the public and public interest groups on TVA environmental affairs.

The staff identifies the need for environmental compliance and control plans and procedures; advises offices and divisions on the development of such plans and procedures; conducts or arranges for the conduct of audits of plans, procedures, and operations; and identifies deficiencies and the need for corrections, as appropriate. Based on these audits and the associated audit reports, the staff prepares compliance status reports for offices and divisions to assist in identifying potential problem trends and assessing the effectiveness of environmental protection methods. In connection with these compliance activities, it keeps the General Manager and the Board apprised of TVA's compliance status.

ONR plans, manages, and carries out programs to protect, conserve, and provide for the unified development of the natural resources including the air, water, and land of the Tennessee Valley region. It prepares periodic reports on regional environmental quality to guide the effective performance of environmental programs and activities and to inform the public of key issues. In coordination with EQS, it conducts and cooperates with other agencies and organizations in conducting environmental research, demonstration projects, and environmental initiatives to assess and meet regional environmental issues and needs including those related to TVA activities. Within its areas of functional expertise, it provides technical assistance and environmental monitoring services in the area of environmental quality to other TVA organizations.

EQS and ONR maintain an office in Casper to ensure that the objectives of TVA CODE IX Environmental Quality are achieved and to provide technical expertise to NUC SVCS. This dual role allows thorough understanding of the plans and activities of the decommissioning project on a continuous real-time basis. This staff conducts technical and corporate office and field reviews and inspections of NUC SVCS and its contractors' activities to ensure and document the level of environmental compliance with NRC license conditions and NRC and TVA Final Environmental Statement commitments. The ONR/EQS and NUC SVCS personnel are further supported by substantial TVA organizations in the Tennessee Valley which maintain specific and detailed expertise on practically every environmental area that pertains to this project's activities.

The findings of the interdisciplinary inspection and audit team are documented to NUC SVCS after each visit and contain specific issues of concern and necessary corrective actions as appropriate. These issue items are maintained on file until formally closed by corrective action documented by subsequent field inspection/audit or written correspondence from NUC SVCS.