

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 19, 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
50-327/85-20 AND 50-328/85-20 - RESPONSE TO VIOLATIONS

Enclosed is our response to R. D. Walker's June 20, 1985 letter to
H. G. Parris transmitting IE Inspection Report Nos. 50-327/85-20 and
50-328/85-20 for our Sequoyah Nuclear Plant which cited TVA with three
Severity Level IV Violations.

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.
50-327/85-20 AND 50-328/85-20
ROGER D. WALKER'S LETTER TO H. G. PARRIS
DATED JUNE 20, 1985

Violation 50-327/85-20-01 and 50-328/85-20-01

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.

1. Admission or Denial of Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

The violation occurred due to personnel error in that the individuals observed did not adhere to existing plant procedures for wearing of dosimetry.

3. Corrective Steps Taken and Results Achieved

A continuous survey was performed for approximately 10 days of all individuals for the proper wearing of dosimetry. During this period two (2) discrepancy reports were issued to responsible section supervisors for individuals not complying with RCI-3 requirements.

4. Corrective Steps Taken to Avoid Future Violations

The following steps are being taken to avoid recurrence:

- A. Health Physics implementing procedures will be reviewed and/or revised for clarity.

- B. A general employee handbook currently being prepared for Sequoyah Nuclear Plant (SQN) will illustrate and describe the proper placement of personnel dosimetry.
 - C. Health Physics technicians have been temporarily assigned to the dosimetry storage rack to ensure personnel obtaining dosimetry are complying with RCI-3 requirements.
 - D. Signs illustrating the proper wearing of personnel dosimetry will be posted at various locations in the plant.
5. Date When Full Compliance Will Be Achieved

The plant will be in full compliance by November 1, 1985.

Violation 50-327/85-20-02 and 50-328/85-20-02

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.

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.

1. Admission or Denial of Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

The violation occurred due to personnel error in that plant personnel did not comply with existing plant procedures for labeling and/or storage of radioactive materials.

3. Corrective Steps Taken and Results Achieved

- A. The items identified were properly labeled as required by 10 CFR 20.203(f).
- B. The items of noncompliance have been discussed at the daily plant staff meetings to ensure the plant management is aware of the problem areas.

4. Corrective Steps Taken to Avoid Future Violations

- A. A training seminar on labeling and/or storage requirements for radioactive materials will be given to the SQN Health Physics technicians.
- B. Implementing procedures will be reviewed and/or revised to agree with 10 CFR 20.203(f).
- C. Health Physics technicians will be instructed to randomly survey plant areas to ensure labeling and/or storage requirements for radioactive materials are met.
- D. A general employee handbook currently being prepared for SQN will include instructions for the proper disposition of radioactive material.

5. Date When Full Compliance Will Be Achieved

The plant will be in full compliance by November 1, 1985.

Violation 50-327/85-20-03 and 50-328/85-20-03

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).

1. Admission or Denial of Alleged Violation

TVA admits that the violation occurred as stated.

2. Reason for Violation

SN Technical Instruction (TI)-61 provides scaling factors for determination of difficult-to-measure isotopes such as transuranics and carbon-14. These scaling factors did not meet the 10 CFR-61.55 factor of 10 limit for measured-to-calculated values for dry active waste (DAW).

3. Corrective Steps Taken and Results Achieved

A temporary change, PORC approved, was made to TI-61 to add corrected scaling factors for DAW to ensure compliance with 10 CFR 61.55. Since identification of the violation, all shipments of DAW have been made in accordance with 10 CFR 61.55 requirements.

4. Corrective Steps Taken to Avoid Future Violations

A permanent revision to TI-61 will be prepared to include new scaling factors for six waste streams based upon the latest sample data.

5. Date When Full Compliance Will Be Achieved

The plant will be in full compliance by November 1, 1985.