

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 31, 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 - REVISED RESPONSE TO VIOLATION

Enclosed is our revised 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. The revised response is being submitted as a result of additional discussions with NRC-Region II representatives and as documented in the July 1, 1985 letter from D. M. Verrelli to H. G. Parris.

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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REVISED 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 JULY 1, 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 admits the violation occurred as stated.

2. Reason for Violation

The violation occurred due to Sequoyah Nuclear Plant (SQN) personnel misinterpreting a previous NRC inspection report that indicated we were in compliance with the intent of the LLD requirement. The inspection was conducted on February 19 - 22, 1980, by L. L. Jackson of the Region II staff and included a review of SQN's effluent release program (Report No. 50-327/80-08 AND 50-328/80-05). The inspection indicated that the RETS sensitivity limits are not rigid limits for all samples. However, in accordance with our telephone conversation with Dan Montgomery, we agree that during the period identified in the violation there were 10 samples of the waste gas decay tanks that did not meet this LLD requirement while 36 samples were within limits.

3. Corrective Steps Taken and Results Achieved

The LLDs for effluent releases, liquid and gaseous, have been reevaluated for all three of SQN'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 in Table 4.11-2. If these times cannot be met, analysts have been instructed to resample.

4. Corrective Steps Taken to Avoid Future Violations

See item 3 for details.

5. Date When Full Compliance Will Be Achieved

The plant is in full compliance.