

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

October 9, 1985 2:54

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
50-327/85-17 AND 50-328/85-17 - REVISED RESPONSE TO VIOLATION

Enclosed is our revised response to R. D. Walker's July 30, 1985, letter to H. G. Parris transmitting IE Inspection Report Nos. 50-327/85-17 and 50-328/85-17 for our Sequoyah Nuclear Plant which cited TVA with one Severity Level IV Violation and three Severity Level V Violations.

This revised response to the subject report addresses comments from S. P. Weise of your staff to H. L. Abercrombie of Sequoyah Nuclear Plant.

Please note that our original submittal incorrectly identified the violations according to the Notice of Violation numbering scheme. The enclosure to our August 28 submittal should be amended as follows:

page 1 change title to read, "Violation 50-327/85-17-04 and 50-328/85-17-03"

page 5 change title to read, "Violation 50-327/85-17-05 and 50-328/85-17-04"

page 7 change title to read, "Violation 50-327/85-17-01 and 50-328/85-17-01"

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

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PDR ADOCK 05000327
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Enclosure

cc: Mr. James Taylor, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

REVISED RESPONSE - NCR-OIE INSPECTION REPORT
NOS. 50-327/85-17 AND 50-328/85-17
ROGER D. WALKER'S LETTER TO H. G. PARRIS
DATED JULY 30, 1985

Violation 50-327/85-17-02

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 approved, maintained and adhered to for all operations involving personnel radiation exposure. These requirements are implemented by procedure RCI-1, "Radiological Hygiene Program," which requires each employee to adhere to Health Physics procedures and protective measures. One protective measure, Radiation Work Permit (RWP) 1-85-105, required a canvas hood be worn in addition to other protective clothing while conducting activities in the Unit 1 containment radiation area.

Contrary to the above, RWP 1-85-105 requirements were not implemented in that an individual was observed conducting activities in the Unit 1 containment without the prescribed canvas hood.

This is a Severity Level V violation. This violation applies to Unit 1 only. (Supplement IV).

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation

The Quality Control (QC) inspector in question was dressed out in accordance with the requirements of RWP 1-85-105 while performing QC inspections on upper and lower limit switches in accumulator room number four. Upon completion of the inspections and while exiting the elevated work area, the inspector's hood fell off while moving through an unusually tight area. As he was climbing down to the floor of the accumulator room, the IRC resident questioned him about dress-out requirements with respect to wearing a hood. The inspector stated that he had dropped it, and it was on the floor below.

3. Corrective Steps Which Have Been Taken and the Results Achieved

In order to ensure compliance with Radiation Control Instruction (RCI)-1, he has been reinstructed in the proper procedures to be followed in the event that protective clothing is lost or damaged during work.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

None.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on May 18, 1985.