

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: SWEC-SQN-14

REPORT TYPE: Sequoyah Nuclear Plant Element

REVISION NUMBER: 0

TITLE: Testing of Air Purifying Respirator Filters

REASON FOR REVISION: N/A

SWEC SUMMARY STATEMENT: The item in this report was identified by the Nuclear Regulatory Commission (NRC) and was included in the Stone & Webster Engineering Corporation (SWEC) systematic analysis. The item evaluated within this report was verified to be adequately addressed and was closed by the NRC.

PREPARATION

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Element Title: Testing of Air Purifying Respirator Filters

SWEC Concerns: A02841130005-001

Source Document: NRC Inspection Report 327, 328/84-34

Report Number: SWEC-SQN-14

Evaluator:	<u>John Knightly</u> J. J. Knightly	<u>7/5/86</u> Date
Reviewed by:	<u>A. G. Debbago</u> A. G. Debbago	<u>9/8/86</u> Date
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I. Introduction

During a routine radiation protection inspection of October 23 through November 2, 1984, the Nuclear Regulatory Commission (NRC) identified one violation (327,328/84-34-01) which was included in the Stone & Webster Engineering Corporation (SWEC) systematic analysis:

A02841130005-001 - Testing air purifying respirator filters before reuse

Information on the background, the corrective actions taken, the verification methodology and analysis, the completion status, and any pertinent references for this violation is included in this report.

II. Verification of SWEC Issues

A. A02841130005-001, Testing Air Purifying Respirator Filters Before Reuse

1. Background - The NRC inspector noted that air dispersed corn oil was used to determine the removal efficiency of air purifying respirator filters before reuse in violation of 10 CFR 20, appendix A, footnote d-2 (b) which requires a thermally generated 0.3 micrometer dioctyle phthalate (DOP) test.
2. Corrective Actions Taken - Sequoyah Nuclear Plant (SQN) stated that further use of air dispersed corn oil tests was suspended pending NRC approval of an exemption to 10 CFR 20, Appendix A, allowing its use in lieu of the suspected carcinogen DOP test. The DOP test was recommended for suspension in notices from National Institute for Occupational Safety and Health (NIOSH), the Department of Energy (DOE), the NRC, and the TVA Industrial Safety Staff with the corn oil used in its place.
3. Verification Methodology - The SWEC issue identified for ECTG verification was stated as follows:

<u>RIMS No.</u>	<u>Issue</u>	<u>RIMS Item</u>
A02841130005	Removal efficiency of respirators filters determined using unapproved substance.	RIMS-001

ECTG reviewed the Sequoyah Compliance Licensing files and NRC status and closure files for correspondence related to this issue. This review of the pertinent documentation formed the basis for this verification activity.

4. Verification Analysis - The ECTG review of the pertinent documentation indicated that the NRC item was adequately resolved.

The NRC found the SQN response to be acceptable and closed the violation in Report 85-20, dated June 20, 1985.

5. Completion Status - Based on the SQN corrective actions, compliance with requirements, and NRC closure of the item, no further action on this item is required. This item is closed.

III. References

- A. NRC Inspection Report Nos. 50-327/84-34 and 50-328/84-34, dated November 21, 1984, from D. M. Verrelli to H. G. Parris
- B. "Sequoyah Nuclear Plant, Units 1 and 2 - NRC-OIE Region II Inspection Report Nos. 50-328/84-34 - Response to Violation," dated January 9, 1985
- C. NRC Inspection Report Nos. 50-327/85-20 and 50-328/85-20 dated June 20, 1985, from R. D. Walker to H. G. Parris