400 Chestnut Street Tower II

March 31, 1981

Mr. James P. O'Reilly, Director Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission Region II - Suite 3100 101 Marietta Street Atlanta, Georgia 30303

Dear Mr. O'Reilly:

This is in response to R. C. Lewis' March 6, 1981, letter to H. G. Parris, Report Nos. 50-259/81-5, -260/81-5, and -296/81-5, concerning activities at the Browns Ferry Nuclear Plant which appeared to violate NRC requirements. Enclosed is our response to Appendix A Notice of Violation. If you have any questions, please call Jim Domer at FTS 857-2014.

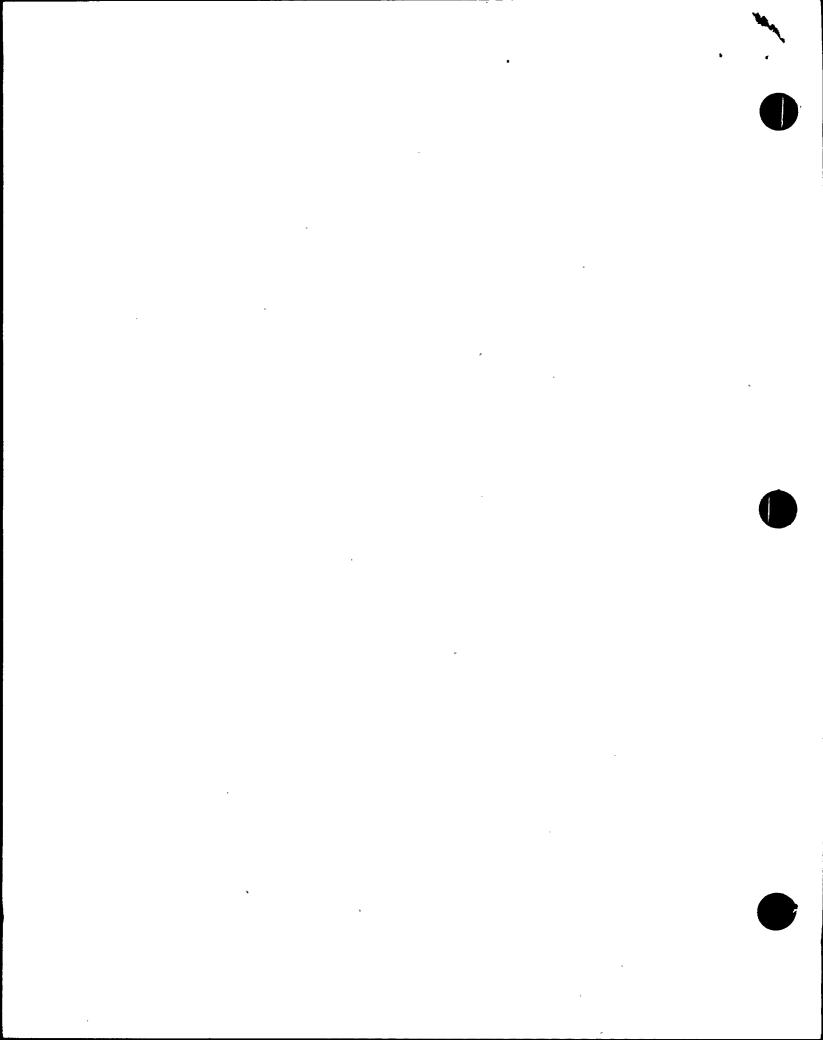
To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L."M. Mills, Manager Nuclear Regulation and Safety

Enclosure



#### ENCLOSURE

RESPONSE TO R. C. LEWIS' LETTER DATED
MARCH 6, 1981, TO H. G. PARRIS'
BROWNS FERRY NUCLEAR PLANT
(DOCKET NOS. 50-259, -260, -296)

#### Violation ·

10 CFR 20.102(c)(2) requires that the licensee shall retain and preserve records which are used in preparing Form NRC-4. A completed Form NRC-4 is required prior to authorizing an individual to receive a whole body dose greater than 1.25 rems in a calendar quarter.

Contrary to the above, the records used in preparing the Form NRC-4 and the Form NRC-4 for an individual authorized to receive a whole body dose greater than 1.25 rem were not filed and retained.

This is a Severity Level VI Violation (Supplement IV.F)

### 1. Admission or Denial of the Alleged Violation

TVA admits that the occupational radiation exposure history record for one individual was not available when requested.

### 2. Reasons for the Violation if Admitted

Since no copies of the NRC Form-4 equivalent exist at any of the normal distribution points for the document, it is evident that the record did not follow routine distribution. The exact point of failure is unknown; however, it is suspected that the record was either misplaced or stolen.

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

The individual involved is no longer employed by TVA. If the individual is reemployed by TVA, we will ascertain any non-TVA occupational exposure through our normal procedures.

# 4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Corrective action to prevent recurrence is to establish a formal interim file for NRC Form-4 equivalent records awaiting final review and disposition.

An inhouse quality assurance audit of occupational radiation exposure history records is being performed.

## 5. Date When Full Compliance Will Be Achieved

The interim file for NRC Form-4 equivalent records awaiting final review and disposition will be established by April 3, 1981. The quality assurance audit and report will be completed by June 1, 1981.

