

TENNESSEE VALLEY AUTHORITY
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

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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.

