

400 Chestnut Street Tower II

January 11, 1983

U.S. Nuclear Regulatory Commission
 Region II
 ATTN: James P. O'Reilly, Regional Administrator
 101 Marietta Street, Suite 3100
 Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Enclosed is our response to your December 17, 1982 letter to H. G. Parris transmitting Inspection Report Nos. 50-259/82-39, -260/82-39, -296/82-39 and proposed civil penalty regarding activities at our Browns Ferry Nuclear Plant which appeared to deviate from NRC commitments. We have enclosed our response to the Notice of Violation and Proposed Imposition of Civil Penalty. The fees in response to the proposed civil penalty of \$3,125 are being wired to the NRC Attention: Office of Inspection and Enforcement.

If you have any questions, please call Jim Domer 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

L. M. Mills, Manager
 Nuclear Licensing

Enclosure

JAD:MLH:SCP

cc (Enclosure):

ARMS, 640 CST2-C
 J. W. Anderson, 902 HBB-K
 J. W. Chase, Browns Ferry - NRC
 H. N. Culver, 249A HBB-K
 H. J. Green, 1750 CST2-C
 R. L. Lumpkin, Jr., 401 UBB-C (2)
 J. A. Raulston, W10C126 C-K
 H. S. Sanger, Jr., E11B33 C-K
 F. A. Szczepanski, 417 UBB-C

COORDINATED: NUC PR/HJGreen memo to LMMills dated 1/10/83
 SP/PJHammons

pdf 8342150681



RESPONSE - NRC INSPECTION REPORT NOS.
50-259/82-39, 50-260/82-39, AND 50-296/82-39
J. P. O'REILLY'S LETTER TO H. G. PARRIS
DATED DECEMBER 17, 1982

259, 260, 296/82-39-01

10 CFR 71.54 requires a licensee to ascertain, prior to each use of a package for shipment of licensed material, that the packaging has not been significantly damaged and that the closure of the package and any sealing gaskets are free from defects.

Contrary to the above, in two instances, the licensee did not meet these requirements. On September 16, 1982, the licensee failed to ascertain that the closure devices of eight 55-gallon drums were free from defects. These drums contained low specific activity waste (TVA Shipment No. 1886). On October 13, 1982, the licensee failed to ascertain that the sealing gaskets on four 55-gallon drums were free from defects and that another 55-gallon drum had not been significantly damaged (apparently it had been pierced by forklift blades). The October 13 shipment was also low specific activity waste (TVA Shipment No. 1914).

This is a Severity Level III violation (Supplement V). (Civil Penalty - \$3,125)

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

An analysis to determine the root cause(s) of the violation was conducted. The problems associated with TVA Shipment No. 1886 were caused by (a) the lack of a method for locking the closure ring bolts to the closure ring lugs and by (b) the loading pattern used to load the drums. The loading pattern caused the drums to be wedged into the trailer, applying stress to the drum closure rings.

The problems associated with TVA Shipment No. 1914 were caused by (a) the lack of administrative controls specifying the use of a mechanical drum-handling device for handling drums and by (b) the use of a separate (2-piece) drum gasket and lid combination. The lack of administrative control over the use (or type) of absorbent in the drum tops may have also contributed to the gasket problem.



Handwritten scribbles or marks in the top right corner.



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

Browns Ferry Standard Practice 7.9, Control of Solid Radwaste Packaging-Drums and Boxes was formally approved and implemented on October 29, 1982. This program specifically requires:

- a. The use of lock-washers and nuts on drum closure rings.
- b. A drum loading pattern that precludes the wedging and stressing of drums and drum rings.
- c. The use of a mechanical drum handling device on forklifts while handling drums.
- d. The gluing of gaskets to drum lids or the use of multi-seal gaskets, which provide a positive, verifiable seal.
- e. Space at the top of each drum, use of a granular type of absorbent in the drum tops, and a "rap" test on each drum before loading.

No recurrences of the cited problems have been noted since implementation of this program.

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

Browns Ferry will continue observation and updating of the plant radwaste packaging and shipping program and its related areas. Procedural changes will be implemented if any problem areas are identified.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on October 29, 1982.

22

