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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
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May 6, 1986

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:

BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3 - NRC-OIE REGION II INSPECTION
REPORT 50-259/86-10, 50-260/86-10, 50-296/86-10 - RESPONSE TO VIOLATIONS

Enclosed is our response to J. A. Olshinski's April 8, 1986 letter to
S. A. White transmitting IE Inspection Report Nos. 50-259/86-10, 50-260/86-10,
and 50-296/86-10 for our Browns Ferry Nuclear Plant which cited TVA with one
Severity Level IV Violation.

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

D. L. Lambert
D. L. Lambert
Nuclear Engineer

Enclosure

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

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ENCLOSURE
RESPONSE
NRC INSPECTION REPORT NOS.
50-259/86-10, 50-260/86-10, AND 50-296/86-10
JOHN A. OLSHINSKI'S LETTER TO S. A. WHITE
DATED APRIL 8, 1986

Item 1

Technical Specification 6.3 required that detailed radiation control procedures be prepared, approved, and adhered to.

Plant procedure BF RCI-8, Radiobioassay Program, required a current whole body count prior to entry into a contamination zone.

Plant procedure BF RCI-9, Radiation Work Permits, required current General Employee Level II training prior to entering an area requiring a radiation work permit.

Contrary to the above, during the period September 1, 1985 to February 28, 1986, the licensee failed to adhere to radiation control procedures in that:

- a. Forty licensee employees entered radiation work permit areas without the training required by plant procedure RCI-9.
- b. Nineteen licensee employees entered contamination zones without current whole body counts as required by plant procedure RCI-8.

This is a Severity Level IV violation (Supplement IV).

1. Admission or Denial of the Alleged-Finding

We admit that the violation occurred as stated. We believe it is important to emphasize that this violation was identified about three months before the NRC inspection. Each deviation event was formally documented by health physics through the Radiological Incident Report (RIR) system.

2. Reasons for the Violation

The completion of all required training and whole body counts is a prerequisite for personnel to obtain a security badge when first reporting to the site. Until September 1985, individual security badges were pulled if the retraining requirements were not kept current. At that time, a decision was made to use the security badge as control of personnel for security reasons only and not to ensure health physics retraining. This change was made to simplify the security access control system. Thus, individuals were made responsible for maintaining their own retraining requirements. Supervisors were notified of the changes to the security badge program during various plant meetings. Our experience since the change is that the new method has not been completely satisfactory as evidenced by the number of deficiencies documented in the RIR system.

It appears that all plant personnel are not aware of health physics training requirements before entry into a radiation work permit area or the requirement of current whole body counts before entry into a contamination zone.



3. Corrective Steps Which Have Been Taken and Results Achieved

Health physics writes RIRs against those individuals who use a Radiological Work Permit (RWP) without having current health physics training or whole body counts. Plant management has stressed these requirements during plant meetings and is reviewing completed RIRs. In addition, effective January 31, 1986, health physics initiated a respirator issue program which has successfully prevented workers with expired health physics training or whole body count from entering a radiation work permit area requiring respiratory protection.

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

- a. Effective May 26, 1986, current health physics training will be required for unescorted access to the protected area.
- b. Plant management will issue a letter to plant employees by May 8, 1986, describing disciplinary action to be taken for entering contamination zones without a current whole body count and for entering a radiation work permit area without current level II training.
- c. The training department will emphasize the following specific issues during General Employee Training beginning May 14, 1986:
 1. Plant procedures require a current whole body count before entry into a contamination zone:
 2. Plant procedures require current General Employee Level II Health Physics Training before entering an area requiring a radiation work permit.
 3. Attentiveness to all posted areas is essential for all plant employees.
 4. Notify health physics if you are not "positive" that you are in full compliance with radiological control procedures.
- d. Health physics will control the ability of personnel to enter RWP areas, including contamination zones, through control of the pocket chamber. Personnel must have a pocket chamber in order to sign on an RWP. Only personnel who meet RWP entry requirements will be issued pocket chambers. Computer software changes will be made to accomplish this action, including pulling the pocket chambers of individuals with expired whole body counts.

5. Date When Full Compliance Will Be Achieved

Our corrective actions detailed in 4.d. will be in place by June 15, 1986, at which time full compliance will be achieved.

