

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2, and 3

Docket Nos. 50-259, 260, and 296
License Nos. DPR-33, DPR-52, and
DPR-68

As a result of the inspection conducted on January 1-31, 1980, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. Technical Specification 3.7.C.1 requires that secondary containment integrity shall be maintained in the reactor zone at all times if primary containment is not being maintained.

Contrary to the above, Technical Specification 3.7.C.1 requiring secondary containment integrity to be maintained was not met in that on January 8, 1981, the inspector observed both air lock doors for Unit 3 open at the same time while primary containment was not being maintained.

This is a Severity Level IV Violation (Supplement I.D.2.) applicable to Unit 3.

- B. 10 CFR 50, Appendix B Criterion IX and Topical Report TVA-TR75-1, paragraph 17.2.9 requires in part that special processes, including welding shall be accomplished by qualified personnel.

Contrary to the above, 10 CFR 50 Appendix B Criterion IX and Topical Report TVA-TR75-1 which requires welding to be accomplished by qualified personnel was not met in that on January 15, 1981 safety related welding was performed on work plan 7779R1, Installation of Hydrogen - Oxygen Monitoring Panel, in which the qualification of the welder could not be determined.

This is a Severity Level V Violation (Supplement II.E.1.) applicable to Unit 3.

- C. Technical Specification 6.3.A.7 requires that radiation control procedures shall be adhered to. Radiological Control Instruction-1 (RCI) requires that all items being released to a clean zone shall be surveyed by Health Physics.

Contrary to the above, on January 29, 1981, the licensee determined that RCI-1 was not adhered to in that: 1. A ladder was found discarded in to a clean area with contamination levels of 150,000 DPM direct and 2,000 DPM smearable. 2. Metal scaffolding was found in a clean area of the plant with contamination levels of 800 DPM direct.

This is a Severity Level V Violation (Supplement IV.E.2.).

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- D. Technical Specification 6.3.A.7 requires that detailed written procedures shall be adhered to for radiation control procedures. Radiological Control Instruction -10 requires that an individual or group of individuals working in a high radiation area shall have a dose rate meter for monitoring radiation levels.

Contrary to the above, on January 14, 1981 Radiological Control Instruction -10 was not adhered to in that four personnel were observed working in a High Radiation area without a dose rate meter.

This is a Severity Level V Violation (Supplement IV.E.2.) applicable to Unit 3.

- E. 10 CFR 19.12 requires that all individuals working in any portion of a restricted area shall be kept informed of the radiation in such portions of the restricted area.

Contrary to the above, on January 15, 1981, 10 CFR 19.12 requiring workers to be informed of radiation in the portions of the restricted area they are in was not met in that personnel were allowed to enter a high radiation area on a Special Work Permit (SWP) which stated that the general area radiation levels were 40 mrem/hr when they were actually 60 mrem/hr to 150 mrem/hr.

This is a Severity Level V Violation (Supplement IV.E.2.) applicable to Unit 3.

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: MAR 10 1981

