TENNESSEE VALLEY AUTHORITY

CHATTANOOGA. TENNESSEE 37401

5000 Chestnut Street Tower II

December 19, 1978

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:

In the Matter of the Tennessee Valley Authority) Docket Nos. STN 50-518) STN 50-519 STN 50-520 STN 50-521

This letter responds to J. T. Sutherland's Office of Inspection and Enforcement letter, RII:ALC 50-518/78-12, 50-519/78-12, 50-520/78-12, and 50-521/78-12, dated November 22, 1978, concerning activities at the Hartsville Nuclear Plants which appear to have been in violation of NRC requirements. Our response to the item of noncompliance identified in Appendix A of Mr. Sutherland's letter is provided in the enclosure.

Very truly yours,

J. J. E. Gilleland

Assistant Manager of Power

Enclosure

cc: Mr. John G. Davis, Acting Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ENCLOSURE

Item A of the Notice of Violation

Section II.B.3 of Attachment B to the Construction Permits required that detailed records of all construction monitoring data will be maintained for use by NRC concliance inspectors and technical staff. The records will contain quarterly summaries documenting the detection of impacts (instances where feedback criteria were exceeded) and, if necessary, the resulting mitigating action and subsequent recovery in water quality.

- Contrary to the above, pH of the east holding pond discharge to Dixon Creek was reported to have exceeded the maximum assigned limit of 9.0 on February 14, 15, and 20, 1978; however, no mitigating action subsequent to the release was defined.
- Contrary to the above, on March 20, 1978, the licensee failed to report excursion of the east holding pond discharge pH above the maximum assigned limit of 9.0.
 The pH recorded was 9.6.

TVA Response

1. The corrective steps which have been taken and the results achieved:

The excursions of February 14, 15, 20, and March 20, 1978, were identified in the quarterly summary for January-March 1978. However, the quarterly summary was deficient in documenting the resulting mitigating actions. At the time of the inspection, this deficiency had been identified in TVA's management audit for the responsible organization. These excursions will be discussed in the Hartsville Nuclear Plants Special Construction Effects Monitoring Study, Peport for the Second Year of Construction, which will be submitted in January 1979 to the Nuclear Regulatory Commission (MRC) in accordance with the requirements of Appendix B of the construction permits.

CE

2. Corrective steps which will be taken to avoid further noncompliance:

A work procedure detailing the - nsibilities of the proper TVA personnel with regard to pH variance reporting has been prepared. This procedure, which will be formally reviewed by the appropriate TVA management before final approval, will be issued and implemented by March 1979.

3. The date when full compliance will be achieved:

Full compliance will be achieved in January 1979 when the <u>Hartsville</u> Nuclear Plants Special Construction Effect Monitoring Study, Report for the Second Year of Construction is submitted to NRC for their review and comment.