

TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
ATLANTA, GEORGIA
400 Chestnut Street Tower II

61 APR 28 A 9: 1^u
April 24, 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:

SEQUOYAH NUCLEAR PLANT UNIT 1 - NRC-OIE REGION II INSPECTION REPORT
50-327/81-10 - RESPONSE TO VIOLATIONS

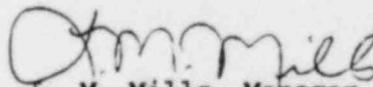
The subject inspection report dated April 3, 1981 cited TVA with one Severity Level IV and one Severity Level V Violation. Enclosed is our response.

If you have any questions, please get in touch with D. L. Lambert at FTS 857-2581.

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

cc: Mr. Victor Stello, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

8105200 315

ENCLOSURE

SEQUOYAH NUCLEAR PLANT
RESPONSE TO VIOLATIONS

Violation 327/81-10-01

Technical Specification 3.11.1.2 requires that when the calculated dose from the release of radioactive materials in liquid effluents during a calendar quarter exceeds 1.5 mrem to the total body or 5 mrem to an organ, a special report shall be submitted to the Commission within 30 days identifying the causes for exceeding the limit and the corrective actions to be taken.

Contrary to the above, a special report was not submitted to the Commission within 30 days after it was determined that the dose to an organ due to radioactive materials in liquid effluents during the third quarter of 1980 was 9.1 mrem.

This is a Severity Level IV Violation (Supplement I.D.4).

Admission or Denial of the Alleged Violation

The violation occurred as stated.

Reasons for the Violation if Admitted

Plant personnel, specifically those responsible for developing and transmitting raw data to the Division of Occupational Health and Safety, were notified verbally in October 1980 that the technical specification limit had been exceeded for the third quarter of 1980. The responsible plant personnel failed to realize the significance of the verbal report and did not report the communication to appropriate management.

On February 9, 1981, plant supervisory personnel were notified in writing by the Division of Occupational Health and Safety that Technical Specification 3.11.1.2 was exceeded for the third and fourth quarters of 1980. The requirement to notify the Commission if a quarterly limit is exceeded was not satisfied within the specified 30-day reporting period. A breakdown in inter/intradivisional communications resulted in the failure to report as required.

Corrective Steps Which Have Been Taken and Results Achieved

Following formal receipt of information from the Division of Occupational Health and Safety, an investigation was performed and the resulting findings were assembled as special report 80-8 dated March 6, 1981. The Commission was notified verbally concerning the violation before preparation of the special report. This special report was submitted within 30 days of official notification of the violation for the third and fourth quarters of 1980.

Corrective Steps Which Will Be Taken To Avoid Further Violations

During a meeting of the Radiological Assessment Review Committee on April 8, 1981, a firm line of communication between the operating plant and the Division of Occupational Health and Safety was formulated. It was agreed that communications between parties related to technical specification requirements shall be handled formally (i.e., in writing) between appropriate levels of management. Verbal communications may continue for informational purposes but must be followed by written verification for prescribed formal reporting action.

It was further agreed that monthly dose calculations shall be provided to the operating plant in order to more effectively track the accrual of offsite dose to the most limiting critical organ. This information shall be used to control plant effluents to ensure technical specification quarterly and annual dose limitations are satisfied.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 6, 1981, when special report 80-8 was submitted.

Violation 327/81-10-02

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering applicable procedures recommended in Appendix A, Regulatory Guide 1.33, Rev. 2, February 1978. Regulatory Guide 1.33 specifies that chemical and radiochemical procedures should be written to specify laboratory instruction and calibration of laboratory equipment.

Contrary to the above, written procedures were not implemented in that reference checks and background checks were not recorded and compared against acceptance criteria as required by plant procedures TI-12 and TI-49 during the period of September through December 1980.

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

Admission or Denial of the Alleged Violation

The violation occurred as stated.

Reasons for the Violation if Admitted

Failure to record required data on the subject data sheet (worksheet 49-F.3-3) was an oversight resulting from a combination of inattention to procedural detail, inadequate supervisory review, and analyst inexperience. Acceptance criteria had not been established due to the relative paucity of generated data during the time period noted in the violation; therefore, this absence of acceptance criteria precluded the performance of the required data comparison.

Corrective Steps Which Have Been Taken and Results Achieved

Revisions to plant instructions, TI-12 (Radiological Analytical Methods) and TI-49 (Radiological Chemical Laboratory Test Equipment Calibration Program), have been initiated to simplify and clarify the quality control data requirements for radiochemical analytical instruments. Appropriate acceptance criteria have been incorporated into the applicable instructions. Radiochemical laboratory analysts have been briefed on the deficiencies and shall be required to review the instruction revisions when issued.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Corrective actions taken to date are deemed sufficient to minimize recurrence.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 15, 1981 when the revised plant instructions, TI-12 and TI-49, will be issued and reviewed by radiochemical laboratory analysts.

Additional Comments

There is considerable doubt that the calculated levels of phosphorus 32 (P-32) reported in special report 80-8 actually existed. Sequoyah Nuclear Plant, being one of the first standardized technical specification plants, is required to meet standards where there is no previous operating experience. The level of P-32 released to the environment is one of these requirements. The extremely low levels that have measured approach the limits of the equipment available to detect them. When these low values are multiplied by the large volumes that the samples represent, the calculated levels become significant per the technical specifications.

We know of no other facility required to make this kind of analysis although the specifications are called standardized technical specifications.