

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

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July 7, 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

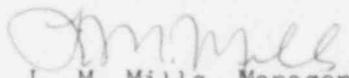
Dear Mr. O'Reilly:

Enclosed is our response to your letter to H. G. Parris dated June 16, 1981, concerning Inspection Report Nos. 50-259/80-36, -260/80-30, -296/80-30, for the Browns Ferry Nuclear Plant. The enclosed provides additional information for Violations B and F.b. This supplements my response to you dated March 27, 1981. If you have any questions, please call Jim Domer at FTS 857-2014.

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

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ENCLOSURE  
SUPPLEMENTAL RESPONSE TO IE INSPECTION REPORT NOS.  
50-259/80-36, -260/80-30, -296/80-30  
APPENDIX B NOTICE OF VIOLATION  
(HEALTH PHYSICS APPRAISAL)  
BROWNS FERRY NUCLEAR PLANT  
(DOCKET NOS. 50-259, -260, -296)

Violation

- B. Technical Specification 6.3.B requires that written radiation control procedures shall be reviewed by the Plant Operations Review Committee (PORC) and approved by the plant superintendent prior to implementation.

Contrary to the above, radiation control procedures were in use which had not been reviewed by the PORC and approved by the Plant Superintendent, in that Health Physics Section Instruction Letters, which contained detailed radiological control instructions, had not been reviewed by the PORC and approved by the plant superintendent.

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

1. Admission or Denial of the Alleged Violation

TVA continues to deny the alleged violation. Section Instruction Letters (SILs) have traditionally been used by TVA for plant sections to issue instructions of an administrative nature or concerning responsibilities, methods, or procedures to be followed by members of the section in areas where PORC review and plant superintendent approval are not required. This is defined in our Operational Quality Assurance Manual. TVA has made several reviews of the health physics (HP) SILs specifically cited by the NRC inspectors and additionally has reviewed all other HP SILs to determine whether these contain information which more properly belong in PORC-reviewed, plant superintendent-approved instructions. From these reviews, we have cancelled SIL-10, the information in it already being contained in another plant instruction. SIL-8, SIL-24, and SIL-25 have been incorporated into RCI's. Our actions regarding this matter were completed on May 27, 1981.

We would like to emphasize that these changes should not be construed as an admission of a violation, but rather a good-faith effort at the plant to be cooperative with NRC and to ensure improvement within our own operations. At the time the alleged violation was cited, it was professional judgment that the information was acceptable contained in a section SIL.

Violation

- F. Technical Specification 6.3A requires that detailed written radiation control procedures shall be prepared, approved and adhered to.

Contrary to the above, detailed written radiation control procedures were not prepared, approved, and/or adhered to, in that:

- b. On October 22, 1980, demineralizer filters were moved in the Radwaste building without taking precautions to minimize the spread of contamination as required by Station Procedure RCI-1, paragraph III.D.

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

Response

TVA continues to deny the violation specified in F.b. Justification for our position is stated in our original response. However, TVA does share NRC's concern over the incident that occurred. To minimize potential for recurrence the health physics employees were informed of the incident and reminded of their assignment responsibility regarding contamination control. This was done through the routine monthly HP communication meeting.