

JUL 21 1994

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Docket Nos. 50-327, 50-328  
License Nos. DPR-77, DPR-79  
EA 94-115

Tennessee Valley Authority  
ATTN: Mr. Oliver D. Kingsley, Jr.  
President, TVA Nuclear and  
Chief Nuclear Officer  
6A Lookout Place 1101 Market Street  
Chattanooga, TN 37402-2801

Gentlemen:

SUBJECT: ENFORCEMENT CONFERENCE SUMMARY  
(NRC OFFICE OF INVESTIGATIONS REPORT NO. 2-93-024R)

This letter refers to the Enforcement Conference held at our request on July 22, 1994. This meeting concerned activities authorized for your Sequoyah Nuclear facility. The issues discussed at this conference related to the apparent submission of inaccurate information by TVA in response to a Notice of Violation regarding the proper labeling and storage of chemicals with respect to Sequoyah's chemical traffic control requirements. A list of attendees is provided as Enclosure 1 to this letter and a copy of your handouts are provided as Enclosure 2.

Your presentation was helpful in clarifying the issues associated with the apparent violation. We are continuing our review of this to determine the appropriate enforcement action.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this matter, please contact us.

Sincerely,

*original signed by  
J. Johnson for*

940809005B 940729  
PDR ADOCK 05000327  
Q PDR

J. Philip Stohr, Director  
Division of Radiation Safety  
and Safeguards

Enclosures:

1. List of Attendees
2. Handout(s)

cc w/encls: (Cont'd on page 2)

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Tennessee Valley Authority

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(cc w/encls: cont'd)

Mr. B. S. Schofield, Manager  
Nuclear Licensing and Regulatory Affairs  
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Mr. Ralph H. Shell  
Site Licensing Manager  
Sequoyah Nuclear Plant  
P. O. Box 2000  
Soddy-Daisy, TN 37379

Mr. Roger W. Huston  
Tennessee Valley Authority  
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11921 Rockville Pike  
Suite 402  
Rockville, MD 20852

Mr. Michael H. Mobley, Director  
Division of Radiological Health  
3rd Floor, L and C Annex  
401 Church Street  
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County Judge  
Hamilton County Courthouse  
Chattanooga, TN 37402

Mr. Bill Harris  
Route 1, Box 26  
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bcc w/encls:

E. W. Merschhoff, RII  
M. Lesser, RII  
S. E. Sparks, RII  
B. M. Bordenick, OGC  
D. E. LaBarge, NRR  
G. C. Lainas, NRR  
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NRC Resident Inspector, Operations  
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Tennessee Valley Authority

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(cc w/encls: cont'd)  
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Dr. Mark O. Medford, Vice President  
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Tennessee Valley Authority

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SEND	OFC	RII:DRSS	RII:DRSS	RII:DRSS	RII:DRP	RII:EICS
TO	NAME	<i>W Rankin</i>	<i>W Rankin</i>	<i>W Rankin</i>	<i>M Lesser</i>	<i>B Uryc</i>
PDR?	DATE	7/26/94	7/26/94	7/26/94	7/21/94	7/28/94
Yes	No	COPY?	Yes	No	Yes	No

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DOCUMENT NAME: S:\DRSS\SEQ-0194.ECS

ENCLOSURE 1

LIST OF ATTENDEES

Licensee Attendees: M. Medford, Corporate Vice President, TVA  
K. Powers, Vice President, Sequoyah Nuclear Power Plant  
C. Kent, Manager, Radiation Protection  
R. Driscoll, Manager, Site Quality  
R. Shell, Site Licensing

NRC Attendees: S. Ebner, Regional Administrator  
C. Evans, Regional Counsel  
P. Stohr, Director, Division of Radiation Safety and  
Safeguards (DRSS)  
J. Jaudon, Deputy Director, Division of Reactor Safety  
W. Cline, Chief, Radiological Protection and Emergency  
Preparedness Branch (RPEP), DRSS  
M. Lesser, Acting Chief, Projects Branch 4, Division of  
Reactor Projects  
W. Rankin, Chief, Facilities Radiation Protection Section  
(FRP), RPEP, DRSS  
L. Watson, Enforcement Specialist, Enforcement and  
Investigation Coordination Staff  
D. Forbes, Radiation Specialist, FRP, RPEP, DRSS  
W. Loo, Radiation Specialist, FRP, RPEP, DRSS  
L. Robinson, Investigator, Office of Investigations  
W. Holland, Senior Resident Inspector, Sequoyah  
D. LaBarge, Senior Licensing Project Manager, Office of  
Nuclear Reactor Regulation  
J. Beall, Enforcement Specialist, Office of Enforcement

CHEMICAL TRAFFIC CONTROL  
ENFORCEMENT CONFERENCE  
TENNESSEE VALLEY AUTHORITY  
SEQUOYAH NUCLEAR PLANT

July 22, 1994  
NRC Region II Office

CHEMICAL TRAFFIC CONTROL  
ENFORCEMENT CONFERENCE  
JULY 22, 1994

INTRODUCTION

K. P. POWERS

SEQUENCE OF EVENTS

R. H. SHELL

10 CFR 50.9 RULE

R. H. SHELL

DISCUSSION OF NOV RESPONSE

R. H. SHELL

SIGNIFICANCE

R. F. DRISCOLL  
C. E. KENT

CONCLUSIONS

K. P. POWERS

## SEQUENCE OF EVENTS

- August 24 - 28, 1992 Routine NRC inspection conducted in the area of occupational radiation safety. The inspection identified a potential violation associated with the chemical traffic control (CTC) procedure.
- August 28, 1992 Incident Investigation initiated to identify and correct CTC problems.
- October 8, 1992 Notice of Violation (NOV) on the CTC procedure issued by NRC.
- October 29, 1992 Plant Operation Review Committee (PORC) approves NOV response.
- November 2, 1992 A SQN Quality Assurance review associated with the CTC program begins. This review is being performed as part of the corrective action from the Incident Investigation commenced in August.
- November 3, 1992 SQN Site Vice President signs NOV response stating TVA is in full compliance.
- November 5, 1992 SQN Quality Assurance completes the review associated with the CTC program.
- November 19, 1992 SQN Quality Assurance issues the report on the CTC program.



## 10 CFR 50.9 RULE

### §50.9 Completeness and accuracy of information

(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.

(b) Each applicant or licensee shall notify the Commission of information identified by the applicant or licensee as having for the regulatory activity a significant implication for public health and safety or common defense and security. An applicant or licensee violates this paragraph only if the applicant or licensee fails to notify the Commission of information that the applicant or licensee has identified as having a significant implication for public health and safety or common defense and security. Notification shall be provided to the Administrator of the appropriate Regional Office within two working days of identifying the information. This requirement is not applicable to information which is already required to be provided to the Commission by other reporting or updating requirements.

## DISCUSSION OF NOV RESPONSE

- TVA response indicated full compliance regarding the cited violation had been obtained.
- TVA's definition of full compliance was: The particular examples cited in the NOV have been corrected and TVA is not aware of any additional uncorrected examples of violations of the subject requirement.
- At the time the NOV was signed, TVA was not aware of any additional examples of CTC observations. The Quality Assurance monitoring report was not complete, and the observations were not available to the signee of the NOV response.
- CONCLUSION: The information provided to the NRC in the NOV response was complete and accurate based on knowledge available at the time. No 10 CFR 50.9a violation had occurred.

## SIGNIFICANCE

- Quality Assurance monitoring report identified observations associated with the CTC program.
- None of the observations involved the use of unapproved chemicals, the improper use of chemicals, or any system ingress as a result of improper chemical utilization.
- None of the observations were determined to be significant enough to warrant generation of a Problem Evaluation Report (PER).
- There is no safety significance associated with any of these observations.
- CONCLUSION: Based on the lack of significance of the additional Quality Assurance observations, no 10 CFR 50.9(b) violation occurred.

### QA OBSERVATIONS

CHEMICAL	LOCATION	OBSERVATIONS	SIGNIFICANCE
Cleaners	4 outside RCA 1 inside RCA	Incomplete label Missing label Improper container	None - (Administrative error)
Snoop (Soap)	2 outside RCA 1 inside RCA	Incomplete label Missing label	None - (Administrative error)
Silicone Sealant (RTV)	2 inside RCA	Incomplete label	None - (Administrative error)
Boric Acid	2 inside RCA	Incomplete label	None - (Administrative error)
Oil	3 outside RCA	Incomplete label Missing label	None - (Administrative error)
Resin	1 outside RCA	Missing label	None - (Administrative error)
Various	Yard area	Incomplete label Missing label	None - (Administrative error)

## CONCLUSIONS

- As discussed in the presentation, at the time the NOV response was signed, the information provided to the NRC was complete and accurate.
- Additional examples of CTC problems identified in the Quality Assurance monitoring report were determined to be minor and nonsignificant.
- CONCLUSION: There was no violation of 10 CFR 50.9.