

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry

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

The following violations were identified during an inspection conducted on January 10 - 13, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification 6.3.A.7 requires that detailed radiation control procedures shall be prepared, approved and adhered to.

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

- (a) The radioactive waste classification, waste stability, manifest preparation and other applicable provisions of 10 CFR Part 61 and 10 CFR 20.311 have not been incorporated into local radioactive materials shipping procedures. Browns Ferry has made ten radioactive waste shipments since the new requirements were effective on December 27, 1983.
- (b) Local radioactive material shipment procedures do not address what actions are required to ensure a similar degree of control as was afforded the initial shipment when a radioactive materials transport has to return to the licensee's site to be reloaded to correct an overweight condition. Such an event has occurred twice in calendar year 1983.
- (c) On January 11, 1984, a licensee employee exited a contamination control zone and did not perform a whole body frisk of his person for contamination contrary to station Radiological Control Instruction (RCI)-1, section III, paragraph IV which requires that each person who exits a contamination control zone perform a whole body frisk.
- (d) On January 11, 1984, three of five individuals sorting contaminated trash on the 565' Elevation of the Unit Three Turbine Building were not complying with all the requirements of the controlling Special Work Permit (SWP) in that SWP 01-3-00139 required taping of anti-contamination gloves closed around the coverall sleeves and these three workers had not done so.

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

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2. 10 CFR 71.5(a) requires that each licensee who transports licensed material outside of the confines of its plant or other place of use, or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the regulations appropriate to the mode of transport of DOT in 49 CFR Parts 170 through 189.

49 CFR 172.202(a) requires that the shipping description of a hazardous material on the shipping paper must contain the appropriate listed information including (1) The proper shipping name prescribed for the material in 172.101 and (2) The identification number (preceded by "UN" or "NA" as appropriate) prescribed for the material in the same section.

49 CFR 172.101 gives the proper shipping name and identification number for a low specific activity material as "Radioactive Material, low specific activity or LSA, N.O.S., UN 2912".

49 CFR 172.203(d)(1) requires that the description for a shipment of radioactive material must contain the listed information including the name of each radionuclide in the radioactive material that is listed in 173.390 of this subchapter.

10 CFR 30.41(c) requires that before transferring byproduct material to a specific licensee of an Agreement State, the licensee transferring the material shall verify that the transferee's license authorizes the receipt of the type, form, and quantity of byproduct material to be transferred.

The State of South Carolina License Number 97 to Chem-Nuclear Systems, Inc., for the operation of the radioactive waste disposal site near Barnwell, S.C., in License Condition 8 states that only radioactive material consigned for burial shall be received at the Barnwell site, unless otherwise authorized by the license or by the State of South Carolina.

- (a) Contrary to the above, the shipping papers for a low specific activity shipment of a box of radioactive tools on January 3, 1984 under control number 0184-166-S were improperly prepared in that the radioactive material description on TVA Form 17111, the shipping manifest, did not specify the proper shipping name, identification number or name of each radionuclide in the radioactive material.
- (b) Contrary to the above, radioactive material was transferred to an Agreement State licensee prior to determining the transferee was an authorized recipient in that, on January 3, 1984, radioactive material other than waste, a box of radioactive tools not intended for disposal, was transferred to the Barnwell site in the absence of a prior approval.

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

3. 10 CFR 20.408(a) states that this section applies to each person licensed by the Commission to: (1) operate a Nuclear reactor designed to produce electrical...energy...

10 CFR 20.408(b) requires that when an individual terminates employment with a licensee described in paragraph (a) of this section...the licensee shall furnish to the ...Commission, a report of the individual's exposures to radiation and radioactive material.

10 CFR 20.409(b) states that when a licensee is required pursuant to 20.408 to report to the Commission any exposure of an individual to radiation or radioactive material, the licensee shall also notify the individual. Such notice shall comply with the provisions of 19.13(a) of this chapter.

10 CFR 19.13(a) requires that the results of any measurements, analyses, and calculations of radioactive material deposited or retained in the body of an individual, shall be reported to the individual.

Contrary to the above, not all of the results of measurements of radioactivity deposited or retained in the body of a terminated employee is reported to the individual in that when the licensee detects quantities of radioactivity above their analysis equipment's lower limit of detection but less than two percent of the maximum permissible organ burden, the report to the individual states that no radioactivity was detected.

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

4. 10 CFR 20.203(e)(1) requires that each area or room in which licensed material is used or stored and which contains any radioactive material in an amount exceeding 10 times the quantity of such material specified in Appendix C of this part shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION, or DANGER, RADIOACTIVE MATERIALS.

Contrary to the above, the used laundered anti-contamination clothing storage racks along the walls of the Service Building main passageway 562' Elevator contain amounts of licensed material in excess of 10 times Appendix C quantities and is not posted.

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

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4 Docket Nos. 50-259, -260 and -296
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Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 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.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: March 14, 1984