

ENCLOSURE

NOTICE OF VIOLATION

Tennessee Valley Authority
Browns Ferry 1, 2, and 3

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

The following violations were identified during an inspection conducted on March 26-30, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 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.

Condition 29 of the State of South Carolina Radioactive Material License No. 097, issued to Chem-Nuclear Systems, Inc. states that wastes may not be received for disposal that contain free-standing water in excess of one-half of one percent (0.5%) waste volume.

Contrary to the above, a resin liner containing in excess of one-half of one percent volume of free-standing water was shipped by the licensee to the Chem-Nuclear Systems site on October 25, 1983.

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

2. 10 CFR 50.59(b) requires that the licensee shall maintain records of changes in the facility, to the extent that such changes constitute changes in the facility as described in the safety analysis report. These records shall include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, the licensee did not maintain a record of a change made to the solid radioactive waste system which connected the bead and Powdex resin systems, nor was a written safety evaluation prepared.

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

3. 10 CFR 20.405(a) requires that each licensee shall make a report in writing within 30 days to the Commission of each exposure of an individual to radiation in excess of the applicable limits of 20.101.

10 CFR 20.408(b) requires that when an individual assigned to work in a licensee's facility but not employed by the licensee, completes the work assignment in the licensee's facility, the licensee shall furnish the Commission a report of the individual's exposure to radiation incurred

during the period of employment or work assignment in the licensee's facility.

10 CFR 20.409(b) requires that when a licensee is required pursuant to 20.405 or 20.408 to report to the Commission any exposure of an individual to radiation, the licensee shall also notify the individual. Such notice shall be transmitted at a time not later than the transmittal to the Commission, and shall comply with the provisions of 19.13(a) of this chapter.

Contrary to the above, the reporting requirements of 10 CFR 20.408 and 20.409(b) were not met in that,

- a. On November 15, 1983 the licensee reported to the Commission that an individual had received a whole body radiation exposure in the third quarter of 1983 in excess of the applicable 20.101 limit; however, the individual was not properly notified.
- b. Radiation exposure reports for individuals not employed by the licensee have not been sent to the Commission, nor to the individual upon completion of the individual's work assignment at the licensee's facility.

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

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: MAY 02 1984