

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 9, 1985

05 SEP 16 P 2:14

U.S. Nuclear Regulatory Commission
Region II

ATTN: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 - NRC-OIE REGION II INSPECTION REPORT
50-327/83-31 AND 50-328/83-31 - REVISED RESPONSE TO VIOLATION

Enclosed is our revised response to J. P. O'Reilly's February 14, 1984, letter to H. G. Parris transmitting IE Inspection Report Nos. 50-327/83-31 and 50-328/83-31 for our Sequoyah Nuclear Plant which cited TVA with five Severity Level IV Violations.

The radiological conditions inside the plant have been changed. This has rendered the key card/RWP cross check obsolete and, therefore, this commitment to perform a cross check is being withdrawn.

If you have any questions, please get in touch with R. E. Alsup at FTS 858-2725.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer

J. A. Domer, Chief
Nuclear Licensing Branch

Enclosure

cc: Mr. James Taylor, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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REVISED RESPONSE - NRC-OIE INSPECTION
REPORT NOS. 50-327/83-31 AND 50-328/83-31
JAMES P. O'REILLY'S LETTER TO H. G. PARRIS
DATED FEBRUARY 14, 1984

Violation 50-327/83-31-01 and 50-328/83-31-01

Technical Specification 6.11 requires that procedures for personnel radiation protection shall be approved, maintained and adhered to for all operations involving personnel radiation exposure. Radiological Control Instruction RCI-14 "Radiation Work Permit (RWP) Program" requires that each worker entering an RWP area record his name, social security number, date, time and dosimeter reading each time he enters and leaves the area and that he comply with any other instructions of the RWP.

Contrary to the above, procedures for personnel radiation protection were not adhered to in that on December 22, 1983, the inspector noted that key card records for door A-8 to the 2A RHR pump room showed that approximately 200 entries were made into the room between November 19 and December 8, 1983. Review of RWP 02-2-00831 time sheets 34, 35, 36, and 37 which were in effect for that time period revealed that only 34 entries were logged.

This is a Severity Level IV Violation (Supplement IV). This violation applies to units 1 and 2.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reasons for the Violation if Admitted

The reason for this violation has been attributed to plant personnel not following plant procedures.

3. Corrective Steps Which Have Been Taken and the Results Achieved

A review of radiological postings for accuracy and clarity was performed by the Health Physics Section. Postings that may have promoted an element of confusion to the workers were corrected.

4. Corrective Steps Taken to Avoid Future Violations

All the corrective steps identified in the initial response have been completed with the exception of the periodic checking of key card records to RWP records. This check is no longer necessary and has not been performed. We will no longer perform this portion of the corrective action. Some key carded areas that have required an RWP for entry in the past have been decontaminated, and the portion of the room requiring an RWP has either been reduced to the point that visual inspections can be performed without an RWP or the

RWP requirement has been eliminated completely. Due to the RWP requirements changing depending on room conditions, the cross check of key card records to RWP records would not provide any useful information to the Health Physics Staff.

5. Date When Full Compliance Will Be Achieved

The plant is in full compliance.