TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

SEP 02 1988

U.S. Muclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket Nos. 50-327 50-328

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2 - NRC INSPECTION REPORT NOS. 50-327, -328/88-31 - RESPONSE TO NOTICE OF VIOLATION

Enclosed is TVA's response to F. R. McCoy's letter to S. A. White dated August 15, 1988, that transmitted Notice of Violation 50-327, -328/88-31-02.

Enclosure 1 provides TVA's response to the notice of violation. Summary statements of commitments contained in this submittal are provided in enclosure 2.

If you have any questions, please telephone M. A. Cooper at (615) 870-6549.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley, Kawager Nuclear Licensing and Regulatory Affairs

Enclosures cc: See page 2

TEO!

cc (Enclosures):

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Enclosure 1

Violation 50-327, -328/88-31-02

"Technical Specification 6.11 requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Licensee Procedure HPSIL-5, Airborne Radioactivity Surveys, Revision 30, April 1, 1988, requires that air samplers be placed as close as possible to the breathing zone of a worker and that this distance should be no greater than one or two feet. Air samplers should be kept off floors.

Contrary to the above, the licensee failed to either establish or to adhere to procedures for personnel radiation protection in that:

- On June 6, 1988, the licensee did not properly perform breathing zone air sampling for a worker in the Unit 2 containment purge filter bank room in that the sampler was placed on the floor at the entrance to the area and at a distance greater than six feet from the worker.
- 2. The licensee had no procedure for beta radiation exposure control evaluations prior to steam generator work or for computing, administering, and documenting work area stay times. Informal section guidelines were used in lieu of approved procedures.

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

Admission or Denial of the Alleged Violation (Example 1)

TVA admits the violation.

Reason for the Violation

The violation occurred because of a Radiological Control Technician's failure to comply with established procedures.

Corrective Steps That Have Been Taken and Results Achieved

An evaluation of the pertinent air sampling procedures has been performed. The procedures evaluated indicate that they are adequate when implemented correctly. The individual involved in this example was subjected to disciplinary action (terminated from TVA).

Corrective Steps That Will Be Taken to Avoid Further Violations

No further corrective action is planned.

Date When Full Compliance Will Be Achieved

TVA is in full compliance.

Admission or Denial of the Alleged Violation (Example 2)

TVA admits the violation.

Reason for the Violation

This example of the violation occurred because existing practices were not adequately proceduralized.

Corrective Steps That Have Been Taken

Health Physics Section Instruction Letter 1, "Radiation Surveys," has been revised to appropriately address computing, administering, and documenting work area stay-times. This was accomplished on July 21, 1988.

Corrective Steps That Will Be Taken to Avoid Further Violations

Existing procedures will be reviewed and revised as appropriate to implement beta radiation exposure control evaluations pertaining to steam generator work. The revision will be completed by October 31, 1988.

Date When Full Compliance Will Be Achieved

TVA will be in full compliance October 31, 1988.

Enclosure 2

List of Commitments

 Revisions to procedures for control of beta radiation exposure control evaluations for steam generator work will be completed by October 31, 1988.