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 50-439 Bellefonte Nuclear Plant, Unit 2, Tennessee Valley Au 05000439  
 AUTH. NAME AUTHOR AFFILIATION  
 MILLS, L.M. Tennessee Valley Authority  
 RECIP. NAME RECIPIENT AFFILIATION  
 O'REILLY, J.P. Region 2, Atlanta, Office of the Director

SUBJECT: Forwards revised response to NRC 810102 ltr re violations noted in IE Insp Repts 50-438/80-27 & 50-439/80-26.  
 Corrective actions: new sequence control chart to be issued w/requirements for weld grinding & insp of grinding.

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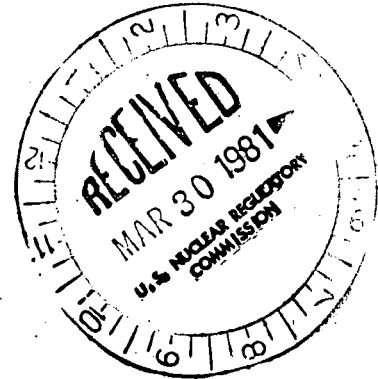
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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

March 26, 1981



Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region II - Suite 3100  
101 Marietta Street  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - VIOLATION 50-438/80-27-01,  
50-439/80-26-01 - FAILURE TO PROVIDE SURGE LINE GRINDING PROCEDURE -  
REVISED RESPONSE

This is a revision to J. L. Cross's January 30, 1981, response to C. E. Murphy's letter dated January 2, 1981, report numbers 50-438/80-27, 50-439/80-26, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. As discussed with D. Quick by telephone on March 19, 1981, enclosed is our revised response to the citation. The reason for the revision is to change the date of full compliance. Full compliance has been delayed because the ongoing evaluation by TVA and B&W has not yet resulted in adequate information for inclusion in the Sequence Control Chart.

If you have any questions concerning this matter, please get in touch with D. L. Lambert at FTS 857-2581.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Jr., Director (Enclosure) ✓  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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ENCLOSURE  
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2  
SEVERITY LEVEL VI VIOLATION  
FAILURE TO PROVIDE SURGE LINE GRINDING PROCEDURE  
50-438/80-27-01 AND 50-439/80-26-01  
REVISED RESPONSE

Description of Violation

10 CFR, Appendix B, Criterion V, and FSAR Paragraph 17.1A.5, requires activities affecting quality to be prescribed by documented procedures or instructions. B&W Drawing 151957E-6 requires that the I.D. of the surge line to pressurizer weld be ground.

Contrary to the above, activities affecting quality were not prescribed by documented procedures or instructions in that on November 21, 1980, Sequence Control Chart SCC-1NC-047, Revision 1, "Install Surge Line Piping," did not address the grinding required by B&W drawing 151957E-6 or the inspection of that grinding.

Admission or Denial of the Alleged Violation

The Sequence Control Chart (SCC-INC-047, Revision 1) does not address the grinding requirement of B&W or the inspection of that grinding.

Reason for Violation

Work at Bellefonte is accomplished in accordance with TVA's Division of Engineering Design (EN DES)-approved documentation. Sequence Control Charts (SCC's) are prepared by TVA's Division of Construction (CONST) when necessary to control installation activities not adequately prescribed by Quality Control Procedures (QCP's) and EN DES-approved drawings. SCC's cover work sequencing, hold points, quality assurance requirements, and transmittal of information to the CONST superintendent. The subject violation occurred as a result of preparation of the SCC before final resolution with B&W on the requirements for grinding of the weld.

Corrective Action Taken and Results Achieved

The SCC will be invalidated and a new SCC will be issued to encompass the requirements for grinding of the weld and the inspection of that grinding.

Steps Taken to Avoid Further Recurrence

Instructions have been given to all CONST mechanical engineers on the importance of providing adequate information in SCC's.

Date of Full Compliance

TVA is still discussing with B&W the method to be used to obtain access to the weld for grinding. As soon as this determination is made, the new SCC will be prepared and issued before performing the welding. The estimated issue date of this SCC is May 1, 1981.