

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

2:46  
November 30, 1984

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNIT 1 - RESPONSE TO VIOLATION 50-438/84-21-01,  
50-439/84-21-01 - FAILURE TO FOLLOW DRAWINGS FOR HVAC SUPPORT ERECTION AND  
INSPECTION

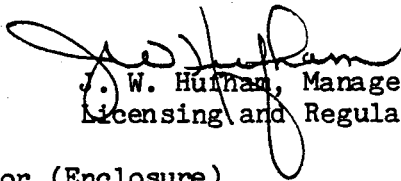
This is in response to D. M. Verrelli's letter dated October 30, 1984,  
report numbers 50-438/84-21, 50-439/84-21 concerning activities at the  
Bellefonte Nuclear Plant which appeared to have been in violation of NRC  
regulations. Enclosed is our response to the citation. Please note that  
TVA intends to provide the results of a random sampling program by  
April 15, 1985.

If you have any questions concerning this matter, please get in touch with  
R. H. Shell at FTS 858-2688.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
J. W. Hufham, Manager  
Licensing and Regulations

Enclosure

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

Records Center (Enclosure)  
Institute of Nuclear Power Operations  
1100 Circle 75 Parkway, Suite 1500  
Atlanta, Georgia 30339

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2  
RESPONSE TO SEVERITY LEVEL V VIOLATION  
50-438/84-21-01, 50-439/84-21-01  
FAILURE TO FOLLOW DRAWINGS FOR HVAC SUPPORT ERECTION AND INSPECTION

Description of Deficiencies

10 CFR 50, Appendix B, Criterion V and Criterion X, and the accepted QA Program (TVA-TR-75-1A, Rev. 7) Section 17.1A.5 and Section 17.1A.10 require in part that activities affecting quality be accomplished in accordance with drawings and that a program for inspection of activities affecting quality be executed to verify conformance with documented drawings. Bellefonte drawing No. 4AW0864-2-1, R4, note 9 requires that Heating, Ventilating and Air Conditioning (HVAC) supports shall be fabricated and erected in accordance with the AISC specification, 1969 edition as revised through 1974.

Contrary to the above, between August 1 - September 30, 1984, activities affecting quality were not being accomplished in accordance with documented drawings in that HVAC support No. OVC-298 did not meet the 1:500 levelness required by the American Institute of Steel Construction (AISC) specification and a program for inspection of activities affecting quality was not executed to verify conformance with documented drawings in that all HVAC supports were not being inspected for this requirement.

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for the Violation

The note contained on the HVAC Duct Support drawing which referenced the AISC specification was included to provide general guidance and information regarding the fabrication and erection of structural steel. The NRC inspection report recognized that the AISC specification did not have HVAC supports specifically addressed for acceptance criteria for levelness and TVA never intended for the 1:500 levelness criteria to apply for HVAC duct supports. Bellefonte Nuclear Plant Quality Control Procedure (BNP-QCP)-6.7, Inspection of HVAC Duct and Mechanical Equipment Supports, states in part that supports should meet drawing and specification requirements. Due to the fact that levelness requirements were not specifically identified on the drawing nor did the AISC specification require levelness criteria for duct supports, the site QCP did not require an inspection for levelness. The site QCP does require an inspection for proper location and elevation.