

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

35 APR 12 A 8:03
April 8, 1985

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:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - RESPONSE TO VIOLATION
50-438/85-06-01, 439/85-06-01 - FAILURE TO ACCOMPLISH ADEQUATE HOUSEKEEPING
IN CABLE TRAYS

This is in response to D. M. Verrelli's letter dated March 11, 1985,
report numbers 50-438/85-06, 50-439/85-06 concerning activities at the
Bellefonte Nuclear Plant which appeared to have been in violation of NRC
regulations. Enclosed is our response to the citations.

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. A. Damer
J. A. Damer
Nuclear Engineer

Enclosure
cc (Enclosure):

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

Records Center
Institute of Nuclear Power Operations
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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL IV VIOLATION
50-438/85-06-01, 50-439/85-06-01
FAILURE TO ACCOMPLISH ADEQUATE HOUSEKEEPING IN CABLE TRAYS

Description of Deficiency

10 CFR 50, Appendix B, Criterion V, as implemented by PSAR Chapter 17, Section 17.1.5, requires activities affecting quality to be accomplished in accordance with documented procedures. ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants," and Bellefonte Nuclear Plant (BLN) Quality Control Procedure (QCP) 10.27, revision 8, with addendum No. 1, "Housekeeping," were identified as the applicable procedures for housekeeping. ANSI N45.2.3, paragraph 3.3 and BLN-QCP-10.27, paragraph 6.3.1.5 require permanent installed equipment be protected to prevent damage from construction activities.

Contrary to the above, on February 13-14, 1985, activities were not accomplished in accordance with documented procedures in that hand tools, safety belts, used sanding belts, documentation, hanger shim plates, and miscellaneous materials were observed abandoned on top of installed unprotected cable in trays.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

The violation occurred as a result of construction personnel working in the vicinity of cable trays containing installed cables, failing to adhere to BLN-QCP-10.27. Material and equipment were allowed to accumulate on top of installed, unprotected cables.

3. Corrective Steps Taken and Results Achieved

All material and equipment that had been accumulated on installed cables has been removed in the affected areas.

4. Corrective Steps Taken to Avoid Further Noncompliance

On March 6, 1985, in BLN's daily planning meeting attended by craft, engineering, and quality control supervisors, the importance of protecting installed cables was discussed from both safety and housekeeping standpoints. The March 25, 1985 Foreman's and Supervisor's

Safety Bulletin also discusses safety aspects of protecting cables. The cable trays containing installed cables will be monitored in the monthly housekeeping inspections conducted by the assistant construction superintendents. Deficiencies discovered during the inspection will be documented and corrective action taken.

5. Date When Full Compliance Will Be Achieved

TVA is in full compliance.