TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

May 15, 1985

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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 - REVISED RESPONSE TO VIOLATION 50-438/85-02-01, 50-439/85-02-01 - CORRECTIVE ACTIONS FOR CONCRETE EXPANSION WEDGE ANCHORS

This is in response to R. D. Walker's letter dated April 18, 1985 and its enclosure containing your staff's assessment of TVA's response of March 8, 1985 to violation 438,439/82-02-01. Enclosed is our revised response to the violation.

If you have any questions, 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

D. E. McCloud
Nuclear Engineer

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

IE01

ENCLOSURE
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
REVISED RESPONSE TO SEVERITY LEVEL V VIOLATION
50-438/85-02-01, 50-439/85-02-01
CORRECTIVE ACTIONS FOR CONCRETE EXPANSION WEDGE ANCHORS

Description of Deficiency

10CFR50, Appendix B, Criterion XVI, as implemented by TVA Bellefonte Nuclear Plant (BLN) FSAR, section 17, require, in part, that measures shall be established to assure that conditions adverse to quality, such as nonconformances, are promptly identified and corrected. This includes the adequacy of investigations to determine causes of the conditions and adequacy of correction action taken to preclude repetition.

Contrary to the above, the adequacy of investigations to determine the causes of the conditions had not been performed in that a review of the response for nonconformance report (NCR) 2833 revealed that the response was misleading as such that the lack of washers would result in wedge bolts being torqued to a higher value than expected. The response was based on judgment instead of detailed evaluations.

TVA Response

1. Admission or Denial of the Alleged Violation

   TVA admits the violation occurred as clarified below.

   The attachment to the NCR form incorrectly stated the technical basis for engineering approval of the use-as-is disposition.

2. Reason for Violation

   The violation occurred because the review of the documented justification on the NCR form was incomplete. The review should have assured that the justification completely and accurately documented the design basis for acceptance of the use-as-is disposition.

   The use-as-is disposition of the NCR was evaluated by the personnel responsible for the criteria for anchorage design and installation. They determined that the use-as-is disposition was acceptable. The primary reason for the acceptability of the disposition was that the installation torques which are required for normal installations result in anchor preloads at least 50-percent greater than the maximum anchor design load. The potential reduction in preload caused by the lack of washers would still provide preloads greater than the maximum design load. However, incorrect terminology was used on the NCR form to justify the use-as-is disposition.

3. Corrective Steps Taken and Results Achieved

Although the technical basis for the use-as-is disposition was adequate, the justification placed on the form was incorrectly stated. NCR 2833 will be revised to correctly state the justification for the use-as-is disposition.

4. Corrective Steps Taken to Avoid Further Noncompliance

TVA's existing engineering procedure 1.26, "Nonconformances--Reporting and Handling by EN DES," section 6.0-9a describes activities surrounding responses to NCRs. This procedure requires the project manager to provide justification for a "use-as-is" disposition "to ensure that the nonconformance will not result in adverse conditions and that the item under consideration will continue to meet all engineering functional requirements including performance, maintainability, fit, and safety." Personnel responsible for the NCR have been instructed to assure that the justification for all dispositions accurately states the design basis for the determination, and where necessary, that the disposition has been reviewed within the appropriate functional area to assure technical accuracy of the response and to identify recurring conditions or trends.

5. Date When Full Compliance Will Be Achieved

The revision of NCR 2833 will be completed by June 20, 1985.