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

June 21, 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 50-438,439/85-13-02 - INADEQUATE PIPE SUPPORT INSPECTION PROCEDURE

This is in response to R. D. Walker's letter dated May 31, 1985, report numbers 50-438/85-13, 50-439/85-13 concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. Enclosed is our response to the citation.

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

J. A. Domer

J. A. Domer, Chief
Nuclear Licensing Branch

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

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ENCLOSURE
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
RESPONSE TO SEVERITY LEVEL IV VIOLATION 50-438,439/85-13-02
INADEQUATE PIPE SUPPORT INSPECTION PROCEDURES

Description of Violation

10 CFR 50, Appendix B, Criterion V, as implemented by the Final Safety Analysis Report (FSAR), Chapter 17, Section 17.1A.5, requires that instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, procedures for the inspection of pipe supports are deficient in that TVA General Construction Specification G-43, revision 7, dated December 17, 1984, "Support and Installation of Piping Systems in Category I Structures," sections 2.8.2.2.b and 2.8.2.2.c, fails to provide when the measurements for the gaps in pipe supports are to be taken. As a result, these pipe supports could be unable to perform their intended function per their design.

TVA Response

1. Admission or Denial of the Alleged Violation

TVA denies the violation occurred as stated.

G-43, revision 7, paragraph 2.8.2.4 states, "For the gaps discussed in Section 2.8.2, support gaps inspected after March 12, 1981 shall have "as-constructed" total gap dimensions recorded and documented during inspection."

G-43, revision 7, paragraph 2.8.2.2.a states, "A temporary shim shall be used in the fit-up stage of all rigid supports . . . ." The temporary shim shall remain in place until the support in inspected.

In response to NRC Unresolved Item 81-21-03, Office of Engineering (OE) provided the following clarification in R. M. Hodges' memorandum to L. S. Cox dated May 16, 1983:

1. The clearance specified in G-43 between a pipe and a box-type support is required at the time of construction.

2. The total gap will vary very little until the pipe is filled with water, pressurized, or put into operation. Therefore, the time of measurment during this time span is not critical.

3. It is not OE's intention to require additional gap inspections once the total gaps are verified and documented in accordance with G-43.

4. Measurement, acceptance, and documentation of the pipe-to-support gap may be performed subsequent to the pipe being filled, pressurized, and placed in operation if the gap was not recorded during the initial construction inspection.

TVA concludes that G-43 is explicit in that the pipe-to-support gap measurement(s) are to be taken during the construction (erection) phase of the support, which is prior to the pipe being filled, pressurized, or put into operation. Once the gap is accepted/documented, any subsequent changes to the gap are of no consequence. This is implemented by Bellefonte Nuclear Plant (BLN) Quality Control Procedure (QCP) 6.17 and verified by the above-referenced memorandum.