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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

36 JAN 17 1986
January 16, 1986: 24

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
50-438,439/85-22-02 - FAILURE TO FOLLOW HVAC DUCT MAP PROCEDURE

This is in response to D. M. Verrelli's letter dated December 12, 1985, report numbers 50-438/85-22, 50-439/85-22 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. 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 V VIOLATION
50-438,439/85-22-02
FAILURE TO FOLLOW HVAC DUCT MAP PROCEDURE

Noncompliance Item - Severity Level V Violation - 50-438/85-22-02 and
50-439/85-22-02

10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the FSAR, requires activities affecting quality be accomplished in accordance with documented procedures and drawings. TVA procedures QCP-6.4, Rev. 7, "HVAC Ductwork" paragraph 6.1.2, requires the Civil Engineering Unit to prepare duct maps indicating unique identification for each duct section, so that each section may be considered for inspection.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that duct map, for safety-related duct, No. DM 1VA-11, Rev. 5 did not uniquely identify four duct sections resulting in those four duct sections not being considered for inspection.

TVA's Response

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

The duct segments were inadvertently left off the duct map through an oversight by Engineering. Since duct maps are normally finalized after the duct is installed, it is assumed the segments were omitted through either a human error or drafting error. Later review by Engineering, before issue, failed to identify the error, and the duct map was issued without the noted segments identified. In addition, revision 6 of Bellefonte Quality Control Procedure (QCP) 6.4, "HVAC Ductwork," effective on January 23, 1985, implemented a sampling program for the inspection of duct segments. This sampling program eliminated the implicit verification that each duct segment was correctly depicted/located on the appropriate duct map that occurred during a 100 percent inspection. Therefore, the error on the duct map was not recognized by Engineering or Quality Control (QC) during duct inspections.

3. Corrective Steps Taken and Results Achieved

- a. The duct sections, which were not identified on Duct Map DM 1VA-11 Revision 5, will be added per a Duct Map Change Request.
- b. Inspection cards will then be generated and processed in accordance with the requirements of BNP-QCP-6.4, R7.
- c. Engineering and/or QC shall verify those duct segments accepted after January 23, 1985 (effective date of sampling program) are correctly located/identified on the appropriate duct map.

Results of these actions will ensure that each of the previously omitted duct segments is identified and is subject to the batch/sampling type inspections.

4. Corrective Steps Taken To Avoid Further Noncompliance:

- a. The applicable engineering personnel will be instructed in the importance of complying with duct segment identification for all sections and correctness of duct maps in accordance with the requirements of BNP-QCP-6.4, R7.
- b. BNP-QCP-6.4 will be revised to require QC to verify the relative position of each inspected duct segment card to ensure each duct segment card is correctly located on the duct map.

5. Date When Full Compliance Will Be Achieved

All corrective steps to avoid further noncompliance will be completed by May 30, 1986. The remainder of the corrective action will be completed by one year before fuel load.

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