

DMB

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

May 16, 1986

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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 UNIT 1 - RESPONSE TO VIOLATION 50-438/86-02-01 -
FAILURE TO FOLLOW INSTRUMENT LINE HYDRO TEST PROCEDURE

This is in response to John A. Olshinski letter dated April 21, 1986, report
numbers 50-438/86-02, 50-439/86-02 concerning an activity 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 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

R. Gridley by *RES*

R. Gridley, Director
Nuclear Safety and Licensing

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 UNIT 1
RESPONSE TO SEVERITY LEVEL V VIOLATION
50-438/86-02-01
FAILURE TO FOLLOW INSTRUMENT LINE HYDRO TEST PROCEDURE

Noncompliance Item - Severity Level V Violation - 50-438/86-02-01

10 CRF 50, Appendix B, Criterion V, and the accepted QA program (TVA-TR-75-1A, Rev. 8) Section 17.1.A.5, requires in part that activities affecting quality be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Bellefonte CTP-4.4, Rev. 2, Flushing and Pressure Testing of Instrument Lines, Section 6.4.1.1.17 requires that when a nonintentional change is necessary to continue an instrument line pressure test, the test director must obtain approval from the Nuclear Power Shift Engineer and the Responsible Engineering Unit (REU) supervisor. This may take the form of verbal approval, but must be followed by signature approval within two days. Additionally, the test director must mark the changes on the change log (Attachment J to CTP-4.4)

Contrary to the above, activities affecting quality were not being accomplished in accordance with documented procedures in that during an inspection on February 19, 1986, of in-process instrument line pressure testing, the inspector observed the following discrepancies from the documented requirements:

- 1) Fire Protection Hydrostatic Test, 1RFCO-H-001, was being performed with a relief valve setting of 235 psig rather than 225 psig as required by the hydro test procedure. The test director stated that the deviation was due to the necessity of placing the test pump and manifold at a location remote to the instrument lines being tested. Approximately 30 feet of elevation difference requiring a test pressure of 230 psig at the test gage (higher than original relief setting). The test procedure had not been changed to reflect the new pressure values.
- 2) Discussion with the test director revealed that verbal approval to use the new pressure values was not obtained from the Nuclear Power Shift Engineer and the Responsible Engineering Unit (REU) supervisor prior to starting the test.

TVA's RESPONSE

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

Failure to follow site procedure. The responsible engineer was not sure that verbal approval was required to change the relief setting since the actual relief pressure on the line being tested had not changed.

3. Corrective Steps Taken and Results Achieved

After being notified of the failure to follow the procedure, the test director promptly obtained approval to revise the relief valve setting from the REU supervisor and the Nuclear Power Shift Engineer. NCR 4747 was written to document this failure to follow procedure.

4. Corrective Steps Taken To Avoid Further Noncompliance:

The subject test director and all other applicable REU personnel were retrained to BNP-CTP-4.4, R2, with emphasis placed on changes to test packages. Training was completed on February 25, 1986.

5. Date When Full Compliance Will Be Achieved:

TVA is now in full compliance