TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
5N 157B Lookout Place

JUL 18 1986

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 DEVIATION 50-438/86-04-01 - SEPARATION CRITERIA FOR INSTRUMENT LINES WERE NOT PROVIDED BY BELLEFONTE DESIGN PROJECT

This is in response to Stephen P. Weise's letter dated June 18, 1986 report numbers 50-438/86-04, 50-439/86-04 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 concerning this matter, please get in touch with D. L. Terrill at FTS 858-2682.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

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
RESPONSE TO NRC-REGION II LETTER FROM
STEPHEN P. WEISE TO S. A. WHITE
DATED JUNE 18, 1986

Reference: Report Nos. 50-438/86-04 and 50-439/86-04

This report responds to Notice of Deviation described in Enclosure 1 of the NRC-Region II inspection report referenced above. This is our final report on this item.

Deviation No. 50-438/86-04-01, Separation Criteria for Instrument Lines were not provided by Bellefonte Design Project

This licensee's Final Safety Analysis Report (FSAR) Section 7.1 committed to conformance with Regulatory Guide 1.75, Revision 1, Physical Independence of Electrical Systems, and Regulatory Guide 1.55, Application of Single-Failure Criteria to Nuclear Power Plant Protection Systems.

Contrary to the above, the FSAR commitments were not incorporated into General Construction Specification G-60, titled Field Routing of Instrument Impulse Lines, Sample Lines, and Control Air Lines until February 14, 1985. As a result, Control Air Lines 1-RJ-LDPR-167B-A and 1-RJ-LDPR-184C-B, which were installed prior to February 1985, were installed with 6 inch separation instead of the required 18 inches.

TVA's Response

1. Corrective Action That Will Be Taken

The separation criteria was not originally included in G-60 because the original concept was to maintain separations on design drawings either by design routing of the lines or by maintaining separation zones which would exclude lines of noncompatible separation designations. As design progressed it became apparent that there might be instances where field routing would result in configurations where the necessary separations are not maintained. Separation criteria was added to G-60 in February 1985 to insure that field routed lines would maintain separation requirements even if exact line routes were not dictated by design drawings.

TVA has identified all lines requiring separation which were completed before February 14, 1985. These lines will be reinspected under the existing requirements of G-60. Any lines failing to meet separation criteria will be identified to Division of Nuclear Engineering (DNE) for corrective action.

2. Corrective Actions Which Will Be Taken To Avoid Further Deviations

All future installations will be made in accordance with G-60 which will ensure conformance with FSAR commitments for instrument line separations. Therefore, no additional corrective action needs to be taken to prevent further deviations.

3. Dates When Corrective Actions Will Be Completed

All construction and design work required to correct any identified separation problems will be complete by six months before fuel load of the applicable unit.

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