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SUBJECT: Responds to NRC 870701 ltr re violation noted in Insp Repts
 50-438/87-03 & 50-439/87-03. Corrective actions: "Condition
 Adverse to Quality Rept" program implemented, most maint
 deficiency repts (MDR) closed & MDR control program revised.

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AUG 14 1987

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Gentlemen:

BELLEFONTE NUCLEAR PLANT (BLN) UNITS 1 AND 2 - NRC REGION II INSPECTION REPORT
NOS. 50-438/87-03 AND 50-439/87-03 - RESPONSE TO VIOLATION

Gary G. Zech's letter to S. A. White dated July 1, 1987 transmitted NRC
Inspection Report Nos. 50-438/87-03 and 50-439/87-03 for Bellefonte Nuclear
Plant. This report cited TVA with one violation: 50-438, 439/87-03-01,
Severity Level IV. Our response to this violation is enclosed.

A delay in submittal of this response to August 14, 1987, was discussed with
NRC Region II Inspector, Al Ignatonis, on August 7, 1987.

If you have any questions, please get in touch with D. L. Terrill at
(205) 574-8820.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. L. Gridley
R. L. Gridley, Director
Nuclear Safety and Licensing

Enclosure

cc: See page 2

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PDR ADOCK 05000438
Q PDR

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U.S. Nuclear Regulatory Commission

AUG 14 1987

cc (Enclosure):

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ENCLOSURE
BELLEFONTE NUCLEAR PLANT (BLN)
RESPONSE NRC REGION II INSPECTION REPORT
NOS. 50-438, 439/87-03
GARY G. ZECH'S LETTER TO S. A. WHITE
DATED JULY 1, 1987

Violation 50-438, 439/87-03-01, "Failure to Indicate Proper Significance of Nonconformance Report (NCR) 4701, Rev. 0"

10 CFR 50, Appendix B, Criterion XVI, as implemented by TVA's Quality Assurance (QA) Topical Report, TVA-TR75-1A, Rev. 8, paragraph 17.1.16 and 17.2.16, "Adverse Conditions and Corrective Actions" require that conditions adverse to quality be promptly corrected and reported to the appropriate levels of management. This requirement is further implemented in Quality Control Procedure (QCP), BN-QCP-10.4, Rev. 14, step 6.11.4.2, which requires any item or condition which, if uncorrected, could adversely affect the safety of plant operations or could have generic implications be classified as "significant."

Contrary to the above, NCR 4701, Rev. 0 issued on January 29, 1986 documented 456 maintenance deficiency reports (DRs) issued in 1985, which had not been dispositioned. The DRs addressed a wide spectrum of systems. Failure to disposition these items is generic to the entire preventive maintenance program. The NCR was dispositioned as non-significant which is contrary to the QCP 10.4 Procedure requirement for "generic" implications.

This is a Severity Level IV Violation (Supplement II) and applies to Units 1 and 2.

1. Admission or Denial of the Alleged Violation

TVA admits to the violation subject to the following clarification. Nonconformance Report (NCR) 4701, Revision 0, was evaluated under Revision 13, in effect on January 29, 1986, instead of Revision 14, of BNP-QCP-10.4. Step 6.11.4.2 of BNP-QCP-10.4, Revision 13, stated, "Any item or condition which, if uncorrected, could adversely affect the safety of plant operations or could have generic implications at this or other TVA nuclear plants."

2. Reasons for the Violation

The independent quality reviewer for NCR 4701, Revision 0, recognized that the failure to disposition maintenance deficiency reports in a timely manner was a site-specific program problem with no generic implications to other TVA sites. NCR 4701, Revision 0, was not recognized by the independent quality reviewer as having generic implications to BLN systems.

3. Corrective Steps Which Have Been Taken and Results Achieved

The new "Condition Adverse to Quality Report" (CAQR) deleted generic implications as a condition for significance on March 31, 1987. The new CAQR program requires a determination as to whether a review for generic implications is needed for all CAQRs independent of significance. BNP-QCP-10.4 remains in place for closure of NCRs open before March 30, 1987.

On May 11, 1987, responsibility for new maintenance deficiency reports was reassigned to Plant Maintenance. Of the maintenance deficiency reports outstanding on May 11, 1987, the majority have been closed or have had all work completed and are awaiting reinspection, and closure of the remaining is being actively pursued. A new tracking program has been implemented to better monitor the closure of these maintenance deficiency reports and to track new maintenance deficiency reports.

NCR 4701, Revision 2, was issued on June 29, 1987, including all delinquent maintenance deficiency reports that had accumulated since issuance of NCR 4701, Revision 0. Revision 2 of NCR 4701 was determined significant on June 30, 1987, based on repetition of a particular nonconformance and is being processed in accordance with BNP-QCP-10.4, Revision 14, and addendum 1.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

The new CAQR program provides more specific criteria for determining significance of a CAQ.

5. Date When Full Compliance Will Be Achieved

TVA is now in full compliance. Closure of all delinquent maintenance deficiency reports is being tracked under the disposition of NCR 4701.