

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

830 Power Building

DEC 8 1978

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 INFRACTIONS 50-438/78-18-01,
50-439/78-18-01 - REACTOR VESSEL CLEANLINESS

This is in response to C. E. Murphy's letter dated November 16, 1978,
RII:RWW 50-438/78-18, 50-439/78-18, 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 regarding this matter, please get in touch
with M. R. Wisenburg at FTS 854-2581.

Very truly yours,



J. E. Gilleland
Assistant Manager of Power

Enclosure

cc: Mr. John G. Davis, Acting Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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ENCLOSURE

BELLEfonte NUCLEAR PLANT UNITS 1 AND 2
INFRACTIONS 438/78-18-01, 439/78-18-01

Infractions 438/78-18-01, 439/78-18-01, Reactor Vessel Cleanliness

10 CFR Part 50, Appendix B, Criterion XVI, as implemented by FSAR Section 17.1A. 16.2 states in part that:

In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above:

1. Monthly storage and maintenance inspections performed on the reactor vessel for units 1 and 2 and documented on Form BNP QCP 1.2 R5 Attachment B reveals that internal cleanliness was found to be "unacceptable" during the inspections noted below:

Unit 1: 11/76, 12/76, 1/77, 2/77, 2/28/77, 3/29/77, 4/28/77, 5/26/77, 6/28/77, 7/27/77, 9/28/77, 10/26/77, and 12/29/77.

Unit 2: 6/28/78, 7/31/78, 8/29/78, and 10/05/78.

2. Finding No. 4 of BNP QA Audit No. BN-M-77-01 dated 1/17/77 reported the presence of 6-8 inches of dirty water standing in the bottom of the unit 1's reactor vessel. The audit finding was closed on 5/5/77 based on corrective action taken at the time. It should be noted . . . , that the reported finding continued to be an "unacceptable" condition beyond the 5/5/77 audit finding closure date. } 3
3. The repetitive occurrence of the condition is considered to be significant. Measures to prevent repetition are inadequate in that repetition of the condition has not been precluded.

Assessment of Infractions

Maintaining internal cleanliness of the RPV's (specifically, preventing the intrusion of rain water) was a repetitive problem, as documented by our maintenance inspection records, during time frames indicated above.

As reflected in responses to finding No. 4 of BNP QA Audit No. BN-M-77-01, numerous corrective repairs were performed on the RPV covers during this time to prevent further water intrusion, but none of these efforts were

completely satisfactory. However, periodic cleanup and maintenance of the protective spraylat coating performed as a result of monthly inspections per BNP-QCP-1.2, prevented any damage to the RPV's.

Corrective Action Taken and Results Achieved

Redesigned sheet metal enclosures were installed and inspected on unit 1 RPV on February 28, 1978, and on unit 2 RPV on November 8, 1978.

No further water intrusion has occurred in either unit since installation of the redesigned enclosures and internal cleanliness has been satisfactorily maintained.

Steps Taken to Avoid Further Recurrence

In addition to the redesigned sheet metal enclosures, periodic maintenance inspections will continue to be performed to verify adequacy of environmental protection.

Date of Full Compliance

Bellefonte Nuclear Plant was in full compliance with the established requirements on February 1978 for unit 1 and November 1978 for unit 2.

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