

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
500C Chestnut Street Tower II
GEORGIA

on MAR 14 MAR 13 1979

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

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 INFRACTIONS 50-438/
79-01-01, 50-439/79-01-01 - HANDLING OF FIELD CHANGE REQUESTS

This is in response to C. E. Murphy's letter dated February 15, 1979, RII:RWW 50-438/79-01, 50-439/79-01, 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
for 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

INFRACTION 79-01-01

HANDLING OF FIELD CHANGE REQUESTS

Infraction 438-439/79-01-01

As required by 10 CFR, Part 50, Appendix B, Criterion V, as implemented by FSAR Section 17.1A.5, activities affecting quality shall be prescribed by documented instructions, procedures and shall be accomplished in accordance with these instructions, procedures. Bellefonte procedure BNP-QCP 10.2 requires that engineer's working drawings will be marked with indicated modifications and that unincorporated Field Change Requests (FCR's) and other pertinent markings are transferred from superseded drawings to new revisions.

Contrary to the above, the licensee failed to assure the following FCR's were marked on engineer's working drawings in the Mechanical Engineering Unit as required by procedure requirements.

1. FCR M-481
2. FCR M-130
3. FCR M-491
4. FCR-M-561

Assessment of Infraction

A review of procedural requirements and open FCR's for the Mechanical Engineering Unit (MEU) indicated that all personnel were familiar with the requirements for marking working drawings with applicable field changes. The infraction resulted from the failure of individuals to carry out these requirements. However, drawing control was still available in that before final acceptance of the work in areas of field changes, the FCR's would have to be verified as incorporated on applicable drawings.

Corrective Action Taken and Results Achieved

All mechanical FCR's were reviewed to ensure that they were marked on working drawings as required by BNP-QCP 10-2.

FCR M-130 was voided. FCR's M-481, 491, and 561 were marked on applicable working drawings. All open FCR's are now marked on applicable working drawings.

Steps Taken to Avoid Further Recurrence

The MEU is preparing a Standard Operating Procedure (SOP) to detail steps to be taken in preparing, documenting, and tracking FCR's to ensure they are handled in accordance with existing procedures. The SOP also includes a monthly review of all FCR's to verify this compliance.

Date of Full Compliance

Bellefonte Nuclear Plant is now in full compliance with existing procedures and the additional SOP will be issued and implemented by March 15, 1979.