

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37403 REGION II
400 Chestnut Street Tower II ATLANTA, GEORGIA

June 30, 1980

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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:

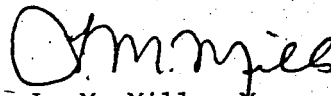
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - DEFICIENCY 50-438, 439/
80-07-02 - FAILURE TO PROVIDE PROMPT NOTIFICATION AND INFRACTION
50-438, 439/80-07-01 - WELDING MATERIAL CONTROLS

This is in response to C. E. Murphy's letter dated June 6, 1980,
RII:EKG 50-438/80-07, 50-439/80-07, concerning activities at the
Bellefonte Nuclear Plant which appeared to have been in violation
of NRC regulations. Enclosed is our response to the citations.

If you have any questions concerning this matter, please get in touch
with D. L. Lambert at FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

cc: Mr. Victor Stello, Jr., 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
RESPONSE TO NRC INFRACTION
WELDING MATERIAL CONTROLS

Infraction 50-438, 439/80-07-01

As required by Criterion V of 10 CFR 50 Appendix B, and as implemented by FSAR Chapter 17, paragraph 17.1.5, "Activities affecting quality shall be prescribed by documented instructions, procedures, ...and shall be accomplished in accordance with these instructions, procedures, or drawings." TVA welding procedure GT8801R6 specifies use of type 308 filler metal. TVA procedure BNP-QCP-8.1 Rev. 3 requires that segregation of different types of filler material be maintained at all times and that the filler material be identified on the issue slip. While TVA has no written instructions requiring welders to maintain bare wire weld filler material in their possession after issue, the licensee stated that the welders had been instructed to either keep such material in their possession until use or return it to specified deposit locations. TVA's procedures and instructions do not specify segregation of safety-related welding filler materials by heats and sizes.

Contrary to the above, on May 6, 1980, a welder had in his possession a mixture of types 308 and 309 bare wire welding filler material. The welding procedure specified for the safety-related piping weld he was completing (2NM00363S1 in the Spent Fuel Cooling and Cleaning System) was GT8801R6. The weld filler material issue slip for the weld indicated issuance of type 308 filler only. On May 7, 1980, unattended bare wire filler material was present in an area where safety-related pipe welding was being performed (near Essential Raw Cooling Water System welds IKE1317S1S and IKE1316S1). On May 6, 1980, in rod issue station (control center) 6 and May 7, 1980, in rod issue station 4 type 308 bare wire filler material for safety-related welding was mixed by heat and size.

This is an infraction. A similar item was brought to your attention in our letter dated May 31, 1979.

Corrective Action Taken and Results Achieved

QCIR 3709 was written to have weld 2NM00363S1 cut out and rewelded.

It is not a requirement by TVA to have filler material segregated by heat and size - only by type. However, it is a site policy to issue only one singular heat of filler material (of the same type and size) from all the rod control centers at one time.

Welder and rod room attendants involved were retrained to Welding Material Control Program requirements.

There have been no further instances of mixed filler material reported to date.

Steps Taken to Avoid Further Recurrence

Bellefonte is in the process of restructuring its Welding Material Control Program. This will consist of closer control over the issue and return of filler material. Also, a detailed Field Construction Procedure (FCP) on filler material control will be written for craft instruction and compliance.

Date of Full Compliance

The welder and rod room attendants involved were retrained on May 15, 1980.

Weld 2NM0036351 was cut out and rewelded on June 2, 1980.

The restructuring of the Bellefonte Welding Material Control Program will be complete by August 1, 1980.

ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 RESPONSE TO NRC DEFICIENCY FAILURE TO PROVIDE PROMPT NOTIFICATION

Deficiency 50-438, 439/80-07-02

As required by 10 CFR 50.55(e), "The holder of a construction permit shall within 24 hours notify the appropriate Nuclear Regulatory Commission Inspection and Enforcement Regional Office of each reportable deficiency."

Contrary to the above, on May 7, 1980, the licensee had taken more than a month to report a reportable deficiency. This deficiency entitled "Under-size Socket and Flange Welds" was reported to the Regional Office on May 7, 1980. The deficiency had been identified by the licensee before March 21, 1980, as evidenced by the examination of the licensee's work on this item described in Region II Report 438, 439/80-04.

Corrective Action Taken and Results Achieved

NCR's of a potentially generic nature are being identified and investigated to resolve QA concerns. The site identified this deficiency on QCIR 3328 on March 20, 1980. The site was investigating the scope of this problem and was withholding issuance of an NCR until the total scope and significance was identified. The NCR was determined to be significant on May 6, 1980, (a period of 46 days from issuance of QCIR 3328), which does not meet TVA's intent to promptly identify and document nonconformances as required in TVA procedures.

TVA procedures require determination of reportability only on significant nonconformances. Since the NCR was determined to be significant on May 6, 1980, and NRC-OIE was notified of this on May 7, 1980, TVA believes the 24-hour notification requirement of 10 CFR 50.55(e) has been met.

Steps Taken to Avoid Further Recurrence

TVA's Office of Engineering Design and Construction (OEDC) is reviewing the timeliness in the initiation and determination of significance of nonconformance reports on nonconforming conditions to ensure that such matters are promptly identified and investigated expeditiously. Specific guidelines on timeliness in handling nonconformances will be identified to all organizations in OEDC.

Date of Full Compliance

TVA believes they are in full compliance with 10 CFR 50.55(e) requirements. Specific guidelines on prompt identification and documentation of NCR's will be identified to all organizations in OEDC by August 30, 1980.