

400 Chestnut Street Tower II

December 12, 1980

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 UNIT 2 - INFRACTION 50-439/80-19-01 - INVALID  
SIGN-OFFS FOR UPPER STEAM GENERATOR RESTRAINT INSTALLATION - SUPPLEMENTAL  
INFORMATION

This is in response to C. E. Murphy's letter dated October 14, 1980,  
RII:JDW 50-438/80-19, 50-439/80-19, concerning activities at the Bellefonte  
Nuclear Plant which appeared to have been in violation of NRC regulations.  
Enclosed is a revision to cur November 5, 1980, response to the citation as  
discussed with R. W. Wright on December 2, 1980.

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*  
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 UNIT 2  
INVALID SIGN-OFFS FOR UPPER STEAM GENERATOR RESTRAINT INSTALLATION  
REVISED RESPONSE TO NRC INFRACTION

Infraction 50-439/80-19-01

As required by 10 CFR 50, Appendix B, Criterion X, XVII and implemented by Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section 17.1A.17, "A program for inspection of activities affecting quality shall be established and executed. . .to verify conformance with documented instruction, procedures and drawings for accomplishing the activity. . ." and "Sufficient records shall be maintained to furnish evidence of activities affecting quality. . . Inspections and test records shall, as a minimum. . .be identifiable. . ."

Contrary to the above, the installation of the steam generator upper restraints was not in accordance with documented instructions, procedures and drawings in that components were interchanged from locations specified in drawings, the material list for piece 902-1-1 specified 24 3-1/2" cap screws whereas 48 were required, and the initialed/dated steps on the sign off sheet for Sequence Control Chart (SCC) No. 2 - NC-055, "Upper Steam Generator Restraint Installation," did not agree with the steps in the procedure.

Corrective Action Taken and Results Achieved

QCIR 4598 was written August 14, 1980, to report the condition. The recommended disposition was to reinspect the generator supports and prepare an NCR to report the results. Sequence Control Chart (SCC) 2NC-107 was prepared to reinspect the upper supports. As a result of the inspection, it was confirmed that the trunnions were not installed per the mark numbers as shown on Lakeside Drawing 9120-902AB. NCR 1255 was then written to report the mislocation of the trunnions and to indicate that the incorrect signoff sheet was used.

The recommended disposition on NCR 1255 was to leave the trunnions in their present configuration and change Lakeside Drawing 9120-902AB by a Field Change Request (FCR) to reflect the as-built configuration. Engineering Design has approved the recommended NCR disposition. At present, four trunnion mark numbers cannot be verified because of construction activities which make them inaccessible. The FCR will be prepared as soon as the mark numbers can be verified.

Steps Taken to Avoid Further Recurrence

All Mechanical Engineering Unit (MEU) employees involved in initiating SCC's and performing related inspections will receive retraining to ensure they understand procedural requirements and to emphasize the necessity for accuracy during preparation and inspection of SCC's.

Date of Full Compliance

Retraining of MEU employees will be completed by October 31, 1980. An FCR will be written to change Lakeside Drawing 9120-902AB by February 27, 1981.