TENNESSEE VALLEY AUTHORITY

# 400 Chestnut Street Tower II

February 19, 1981 All . 31

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 1 - VIOLATION 50-438/80-28-01 - FAILURE TO PROTECT MECHANICAL EQUIPMENT BY USING IMPROPER RIGGING TECHNIQUES

TVA is resubmitting, under oath, our January 23, 1981, response to C. E. Murphy's letter dated December 30, 1980, report numbers 50-438/80-28, 50-439/80-27, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. As discussed with F. S. Cantrell by telephone on February 4, 1981, enclosed is our response to the citation.

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

Very truly yours,

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TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager Nuclear Regulation and Safety

Sworn to and subscribed before me this the day of the 1981

Notary Public

My Commission Expires 9-5-84

Enclosure

cc: Mr. Victor Stello, Jr., Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

#### ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNIT 1
SEVERITY LEVEL V VIOLATION
FAILURE TO PROTECT MECHANICAL EQUIPMENT BY USING
IMPROPER RIGGING TECHNIQUES
50-438/80-28-01

## Description of Violation

10CFR50, Appendix B, Criterion XIII, and Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section 17.1A.13, requires "Handling, Storage, and Shipping" measures shall be established to control handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration . . . "Paragraph 6.3 of TVA's Field Construction Procedure 3.4.2, Revision 5, requires that equipment, snubbers, sway struts . . . shall not be used for hoist supports without prior engineering approval.

Contrary to the above, on November 17, 1980, pipe restraint ORE-MPHG-0044 was rigged and supported from sections of the 8" essential service raw cooling water piping, the 8" emergency feedwater piping, and the 4" demineralized water piping without prior engineering approval. (This pipe restraint weighs in excess of 550 pounds.)

# Admission or Denial of Alleged Violation

The unauthorized rigging, as described in the subject violation, occurred as stated.

#### Reason for Violation

The subject violation occurred as a result of craft employees failing to comply with the requirements established in Bellefonte Field Construction Procedure (BNP-FCP) 3.4.2, Revision 5.

## Corrective Action Taken and Results Achieved

The craft employees involved were instructed to immediately remove the unauthorized rigging. Quality Control Investigation Report (QCIR) 6289 was generated to investigate the situation and determine if any damage to permanent equipment had occurred. Craft management in the steamfitters craft, which was involved in this particular violation, were reinstructed to the requirements of BNP-FCP-3.4.2.

Results of the QCIR investigation indicated no damage had been done to permanent piping, equipment, or components.

# Steps Taken to Avoid Further Recurrence

All applicable craft management has been reinstructed in the requirements of BNP-FCP-3.4.2.

All applicable craft foremen will be trained in accordance with Bellefonte Quality Control Procedure (BNP-QCP) 10.30, "Craft Training," to the requirements of BNP-FCP-3.4.2. Future violations of this procedure will result in disciplinary actions.

## Date of Full Compliance

The specific violation was corrected immediately upon notification by the NRC inspector.

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The investigation to determine if any damage had resulted to permanent material was completed on January 12, 1981.

Training of applicable craft foremen will be completed by March 31, 1981.