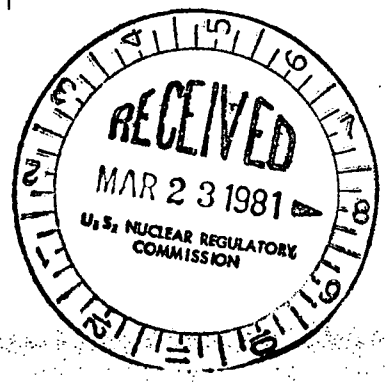


*Central file*

400 Chestnut Street Tower II

JAN 16 P 4: 22

January 13, 1981



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:

Thank you for your response of December 5, 1980, to our October 21 and 24, 1980, letters regarding activities at Bellefonte Nuclear Plant which appeared to have been in violation of NRC requirements. In your letter and in the original notice of infractions (reference RII:JJB 50-438/80-14, 50-439/80-14), you indicated a number of areas in which you believe improvement is necessary in the TVA programs. We believe you have made good points concerning areas of possible improvement. We have taken action to improve our program in the areas you noted as being deficient. However, we believe that there are some misunderstandings which could best be resolved by a meeting of those concerned.

For example, item 1.a of your December 5 letter references ASME Code, NC-5521 of Section III. ASME, in Code inquiry NI79-209, ruled that it is not required that examination activities to verify compliance to the various NX-4000 requirements for welds be performed in accordance with NX-5000 requirements for procedures and personnel qualification (which invokes SNT-TC-1A). The visual inspection of piping welds performed by TVA is part of the in process examination and is conducted to conform to requirements of NB/NC/ND-4000. Visual examination is not specified in NB/NC/ND-5000 for these welds. For this reason, certification of nondestructive examination personnel in NB/NC/ND-5521 is believed to be not appropriate.

Another example is where item 1.b(1) of your letter cites Article 9 of Section V of ASME Code and TVA's visual procedure 3.M.5.1(d). TVA's Process Specification 3.M.5.1 requires that accessible internal weld surfaces be examined. This is not a requirement of the ASME Code. It is Bellefonte practice for those welds in which the root would be inaccessible (i.e., not directly viewable as between a pipe elbow and pipe, etc.) to leave a 1-inch window (segment unwelded) until

8103240593  
Q

Mr. James P. O'Reilly, Director

January 13, 1981

completion of the remaining portion of the weld. The weld root can then be inspected through this window. In this manner, only the root of the window is inaccessible for inspection. The referenced weld (2RK-00336) was examined in this manner on July 16, 1980. The NRC inspector, on July 27, 1980, witnessed the examination of the completed weld which was not intended nor required to be examined. The area of disagreement on this item appears to be in definition of "accessible."

Several other items of misunderstanding appear in our review of your December 5, 1980, letter, but we have not attempted an item-by-item discussion in this letter.

Regarding your request for us to provide corrective actions, etc., provided below is information reflecting the current status of each item.

Regarding Infraction 438, 439/80-14-01, our response of October 24, 1980, indicated we reviewed our visual examination program regarding the specific items (1) and (2) noted in the infraction and regarding our previously identified welds noted by your item (3). We feel our review and findings as expressed in our October 24, 1980, letter are adequate corrective steps taken and results achieved. We believe that our program as now being implemented with the procedural changes and inspector retraining noted are adequate corrective steps taken to avoid further noncompliance. Full compliance on this matter was attained following completion of our review on October 6, 1980.

Specifically regarding Infraction 438, 439/80-14-02, our corrective steps taken and results achieved are that we revised our procedure as previously indicated in our October 24, 1980, letter (Process Specification 3.M.2.1, Revision C) to include a statement on the method of applying or removing powder and a sketch of a method to ensure coverage of the test surface. We believe implementation of the provision of this revision provides adequate corrective steps taken to avoid further noncompliance. Full compliance was achieved by October 6, 1980 (assuming resolution of our outstanding issues).

We have also reviewed the overall concerns expressed by your letters and conversations with us. We are dedicated to constructing the Bellefonte Nuclear Plant to applicable ASME criteria. However, from a generic sense, we have been unable to pinpoint where we have violated the specific requirements contained in the applicable portion of the ASME Code. As

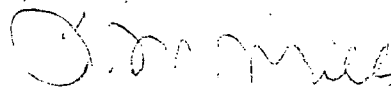
Mr. James P. O'Reilly, Director

January 13, 1981

discussed with your staff, we would like very much to meet with you and your staff at 10 a.m. on January 22, 1981, in your Atlanta office to discuss this concern from a generic sense or to any level of detail you wish. In that way, we would hope to avoid future misunderstandings or miscommunications on items of this type. David Lambert of my staff will be in touch with you to determine the location of the meeting.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Regulation and Safety

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