

TENNESSEE VALLEY AUTHORITY NRC REGION II
CHATTANOOGA, TENNESSEE 37401
ATLANTA, GEORGIA

400 Chestnut Street Tower II

March 6, 1981

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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 UNIT 1 - VIOLATION 50-438/80-31-01 - USING
UNAPPROVED PROCEDURE TO PERFORM TRAIN A ERCW FLUSH

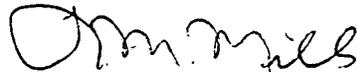
This is in response to C. E. Murphy's letter dated February 9, 1981, report numbers 50-438/80-31, 50-439/80-30, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. Enclosed is our response to the citation.

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

To the best of my knowledge, I declare the statements contained herein are complete and true.

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 UNIT 1
SEVERITY LEVEL VI VIOLATION
USING UNAPPROVED PROCEDURE TO PERFORM
TRAIN A ERCW FLUSH 50-438/80-31-01

Description of Violation

10 CFR 50, Appendix B, Criterion VI requires measures be established to assure that procedures are reviewed for adequacy and approved for release by authorized persons.

Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section 17.1A.11.3, Rev. 17, "Construction Testing" states in part: "Various electrical and mechanical tests are performed in accordance with written procedures... Final detail procedures for construction testing, which include prerequisites for preoperational testing, are reviewed by proper divisions in the Office of Engineering Design and Construction (OEDC), Power, and the NSS vendor."

Contrary to the above, measures to ensure that procedures are reviewed for adequacy, and approved for release were not met in that between August 7 and August 25, 1980, the essential raw cooling water system was flushed using a procedure that had not been approved by OEDC, Office of Power, or the NSS vendor as evidence by the lack of signature on the procedure or supporting documentation.

Admission or Denial of Alleged Violation

The Train A Essential Raw Cooling Water (ERCW) System flush, as described in the subject violation, occurred as stated.

Reason for Violation

TVA Division of Construction (CONST) failed to realize that the flush was in violation of FSAR section 17.1A.11.3 since it was CONST's intent to flush and test the ERCW System in its entirety at a later date. The subject flush was performed only to provide necessary cooling water to support vendor testing of the Control Building Train A chiller.

Corrective Action Taken and Results Achieved

FSAR section 17.1A.11.3 is being revised, in accordance with L. M. Mills' letter to H. R. Denton dated December 9, 1980, to further define the method to be used by CONST in writing, approving, and controlling construction test procedures.

The Construction Test Procedure Manual (CTPM), as described in the proposed FSAR change, will provide necessary generic procedures for performing and documenting future construction tests.

Steps Taken to Avoid Further Recurrence

All future construction testing of safety-related systems will be accomplished in accordance with the requirements of the proposed FSAR revision.

Date of Full Compliance

Bellefonte Nuclear Plant is now in compliance with established requirements of the proposed FSAR revision.