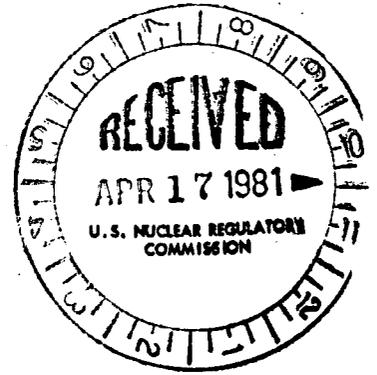


TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

April 10, 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:

BELLEFONTE NUCLEAR PLANT UNIT 1 - VIOLATION 50-438/81-09-01 - FAILURE TO FOLLOW PROCEDURE FOR PROTECTING SAFETY-RELATED CABLES ADJACENT TO ONGOING CONSTRUCTION ACTIVITIES

This is in response to R. C. Lewis' letter dated March 19, 1981, report numbers 50-438/81-09 and 50-439/81-09, 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 V VIOLATION  
FAILURE TO FOLLOW PROCEDURE FOR PROTECTING SAFETY-RELATED  
CABLES ADJACENT TO ONGOING CONSTRUCTION ACTIVITIES  
50-438/81-09-01

Description of Violation

10 CFR 50, Appendix B, Criterion V as implemented by FSAR Section 17.1A.5 requires that activities affecting quality be accomplished in accordance with documented procedures. Field Construction Procedure (FCP) - 3.4.2, Revision 5, is the instruction used for the protection of electrical/mechanical equipment and cables during construction. FCP 3.4.2, Section 6.1 states in part that prior to performing any welding, cutting, scaffolding, drilling, or other construction activities in the vicinity of permanent mechanical or electrical equipment, the construction superintendent or his representative shall provide any covering or other protection required to prevent the permanent equipment from being damaged by the construction activity.

Contrary to the above, on March 4, 1981, activities affecting quality were not accomplished in accordance with documented procedures in that the following were noted:

1. Welding sparks were falling through the grid flooring onto safety-related cables located near the cable tray node point C145-V2A.
2. A yellow cable tray containing safety-related cables near node point AD40 (in the Auxiliary Building) was observed to have a high wattage construction light stored on top of the cables.

Admission or Denial of Alleged Violation

The failure to follow procedures for protecting safety-related cables occurred as stated above.

Reason for Violation

Steamfitter craft personnel were welding a pipe support in an area above safety-related cables. Protection of the surrounding areas was attempted; however, sparks were bouncing off the work scaffold passing through a grid floor and into the cable tray.

The second instance of failure to adequately protect safety-related cables resulted when a high wattage construction light was placed on top of safety-related cables by unidentified craft personnel.

Both of the above situations resulted when craft personnel failed to follow Field Construction Procedure (FCP) 3.4.2, "Protection of Electrical/Mechanical Equipment and Cables From Construction Activities," which implements the requirements for protection of permanent equipment from damage during ongoing construction activities.

### Corrective Action Taken and Results Achieved

The welding activity was immediately stopped and adequate protection was given the electrical tray and cables before welding was resumed. The cables involved were visually inspected by a Quality Control (QC) inspector and no damage was found.

The high wattage construction light was removed from the safety-related cables. The cables involved were then visually inspected by a QC inspector and again, no damage was found.

### Steps Taken to Avoid Further Recurrence

During a meeting on March 9, 1981, involving craft and engineering supervision, the subject violation was discussed and implementation of FCP 3.4.2 was reemphasized to craft supervisors.

Another meeting involving the Electrical Engineering Unit (EEU) and electrical craft supervisors was conducted on March 17, 1981. The violation was again discussed, and it was emphasized by engineering management that electrical inspectors and craftsmen alike should be aware of the requirements for protection of equipment and should be looking for situations such as those described in the subject violation so immediate corrective action can be implemented.

In addition, the EEU supervisor discussed the subject violation with the craft superintendent in charge of the steamfitter craft on March 26, 1981. The craft superintendent indicated that the protection of permanent features from welding activities had been reemphasized to his personnel.

### Date of Full Compliance

The two specific examples of noncompliance were immediately corrected upon notification by the NRC inspector (March 4 and 5, 1981).

As of March 27, 1981, craft and engineering supervisors have been instructed to assist in eliminating these type violations.