

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 UNITS 1 AND 2 - VIOLATION 50-438/81-08-01 AND  
50-439/81-08-01 - INRYCO FIELD INSTALLATION MANUAL NOT UPDATED

This is in response to R. C. Lewis' letter dated March 20, 1981 report numbers 50-438/81-08 and 50-439/81-08, 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

B019  
S  
1/1

Q

810.4200359

ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2  
SEVERITY LEVEL VI VIOLATION  
INRYCO FIELD INSTALLATION MANUAL NOT UPDATED  
50-438/81-08-01 AND 50-439/81-08-01

Description of Violation

10 CFR 50, Appendix B, Criterion V and accepted QA program described in the FSAR Paragraph 17.1A.5, requires that activities affecting quality shall be prescribed by documented procedures and instructions and shall be accomplished in accordance with these procedures and instructions. Bellefonte Quality Control Procedure QCP 10.2, Section 6.2.4, requires all unit-controlled procedures be maintained current by quality control records unit personnel.

Contrary to the above, quality control record unit's master control copy No. 00302 of INRYCO's Field Installation Manual was not maintained current with the latest applicable comments. However, no construction activity appears to have been affected in that both TVA's civil engineering surveillance personnel and INRYCO's QC personnel were working to procedures with the latest approved comments.

Admission or Denial of Alleged Violation

The failure to maintain the INRYCO Field Installation Manual up to date occurred as cited in the violation.

Reason for Violation

Quality Control Record Unit's (QCRU's) master controlled copy, No. 00302, of INRYCO's Field Installation Manual is officially controlled by INRYCO and is updated, i.e., revised by INRYCO. However, changes to various sections of the manual are approved by TVA and transmitted to INRYCO for formal incorporation into the manual. These changes become effective at the time of TVA approval and are sent to the site at the same time they are transmitted to INRYCO. The subject violation occurred as a result of QCRU personnel not recognizing the "approved with comments" revisions to the Field Installation Manual as "preliminary" or "advanced" information and incorporating this information into the QCRU master copy of the manual as required by BNP-QCP-10.2, "Drawing Control."

Corrective Action Taken and Results Achieved

All changes found in QCRU files, associated with the INRYCO Field Installation Manual, were immediately filed with QCRU's master controlled copy, and verification was made that the TVA Civil Engineering Unit's (CEU's) copy of the manual and the master copy agreed. A memorandum requesting a listing of all INRYCO documents indicating the latest revision and approval status was sent to TVA's Division of Engineering Design to confirm that the site has the latest approved INRYCO documents.

Since INRYCO personnel work from a Field Installation Manual maintained current through INRYCO's document control system, and TVA's CEU personnel perform surveillance of INRYCO work from a manual maintained current and independently by TVA, the chance that both manuals would have identical errors is remote. Therefore, construction activities were not adversely affected because QCRU's master copy was not up to date.

An investigation is being conducted to determine if similar conditions exist on other quality-related contracts for BLN and to determine the corrective action if any similar conditions are found.

Steps to Avoid Further Recurrence

Applicable QCRU personnel have been retrained to the requirements of BNP-QCP-10.2 pertaining to the processing of "preliminary" or "advanced" information.

Date of Full Compliance

Confirmation that QCRU's and CEU's INRYCO documents are current will be completed by April 24, 1981.

The investigation to determine if similar conditions exist on other contracts will be completed by July 15, 1981.