

TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

USNRC REGION I
ATLANTA, GEORGIA

August 13, 1981 AUG 17 A 8: 5

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 - RESPONSE TO VIOLATIONS 50-438,
50-439/81-16-03 - STORAGE SHED FOR REACTOR COOLANT PUMP ASSEMBLIES WAS NOT
WEATHERTIGHT AND 50-438/81-16-06 - REACTOR COOLANT PIPE WELD CONTAINS
UNACCEPTABLE DEFECTS

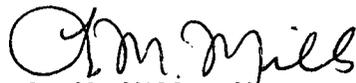
This is in response to R. C. Lewis' letter dated July 14, 1981, report
numbers 50-438/81-16, 50-439/81-16, concerning activities at the Bellefonte
Nuclear Plant which appeared to have been in violation of NRC regulations.
Enclosed is our response to the citations.

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 UNITS 1 AND 2
SECURITY LEVEL V VIOLATION
STORAGE SHED FOR REACTOR COOLANT PUMP ASSEMBLIES WAS NOT WEATHERTIGHT
VIOLATION 50-438, 50-439/81-16-03

Description of Violation

10 CFR 50, Appendix B, Criterion XIII, as implemented by FSAR paragraph 17.A1.13, requires in part that measures be established to control storage and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. Licensee's procedure, BNP-QCP-1.2, requires Level C items to be stored in a weathertight structure.

Contrary to the above, the storage structure for reactor coolant pump assemblies (Level C items) allowed rain water to pour through a roof opening onto crated components.

Admission or Denial of Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

The roof of shed "F," which houses reactor coolant pump assemblies, is constructed of removable panels to facilitate lifting large pieces of equipment in or out of the structure. Apparently, when the panels were put back in place sometime before the violation, they were not properly resealed. In addition, because of usage and age, minor leaks had developed around some of the nail holes in the panels. This storage area is scheduled for inspection every six months, and the violation occurred between inspections.

Corrective Action Taken and Results Achieved

The roof panels of shed "F" were properly resealed and the nail holes were resealed. Reinspection revealed that the shed had been returned to its originally intended weathertight condition.

Steps Taken to Avoid Further Violations

In addition to the scheduled six-month inspections, the facilities will be reinspected on a random basis to assure the requirements of Bellefonte Quality Control Procedure BNP-QCP-1.2 for level "C" storage are maintained. A memorandum from the construction engineer to the construction superintendent has been prepared emphasizing the importance of reestablishing the weathertight integrity of level "C" storage when work involves removing roof panels from storage sheds.

Date of Full Compliance

TVA was in full compliance as of July 24, 1981.

BELLEFONTE NUCLEAR PLANT UNIT 1
SEVERITY LEVEL V VIOLATION
REACTOR COOLANT PIPE WELD CONTAINS UNACCEPTABLE DEFECTS
VIOLATION 50-438/81-16-06

Description of Violation

10 CFR 50.55(a), as implemented by FSAR Table 5.2.0-1, requires piping which is part of the reactor coolant pressure boundary shall meet the requirements for Class I components set forth in Section III of the ASME Boiler and Pressure Vessel Code. Section III of the ASME Code specifies that welds that are shown by radiography to have an elongated indication which has a length greater than 3/4 inch (for the weld thickness in question) is unacceptable.

Contrary to the above, radiographs for reactor coolant pressure boundary weld 1NC-00008 show slag inclusions having lengths greater than 3/4 inch in two different locations.

Admission or Denial of Alleged Violation

TVA concurs in part with the findings cited in the subject violation. As stated in paragraph 8.a of the subject OIE report, radiographic film section A-B for weld 1NC-00008 showed unacceptable slag inclusions even though the final automated process control weld status record, i.e., 1NC-00008 RS, indicated acceptance. However, qualified site employees have again reviewed radiographic film sector G-H for this weld, and their interpretation is that the inclusion is not in excess of the 3/4 inch maximum allowed by the code. Therefore, with respect to section G-H, TVA denies the alleged violation.

Reason for Violation

With regards to section A-B, the reason for the violation is based upon an oversight on behalf of the radiographic record reviewer. The weld should have remained in a reject status until acceptable film of the A-B completed repair was obtained.

Corrective Action Taken and Results Achieved

On June 15, 1981, radiography of section A-B was performed. Since the film showed an acceptable repair was made, either the area in question was not previously radiographed after repair or was radiographed and the film lost.

All 1 and 2 component cooling system radiography film packages were then comprehensively reviewed for instances of similar discrepancies. No other discrepancies were found.

Steps Taken to Avoid Further Violations

Radiographic record reviewers were cautioned to exercise greater care in review of technique sheets before signing off final acceptance of welds. This will ensure that more careful review of radiographic film packages will be conducted in order to preclude recurrence.

Date of Full Compliance

TVA is currently in full compliance.