

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 4, 1981

81 SEP 9 A 8: 38
USNRC REGION II
ATLANTA, GEORGIA

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 2 - RESPONSE TO VIOLATION 50-439/81-18-04 -
FAILURE TO DOCUMENT WELD INSPECTION RESULTS

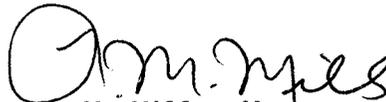
This is in response to R. C. Lewis' letter dated August 5, 1981, report numbers 50-438/81-18, 50-439/81-18, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. Enclosed is our response to the citation.

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

8109240587 810915
PDR ADOCK 05000439
Q PDR

ENCLOSURE
BELLEFONTE NUCLEAR PLANT UNIT 2
SEVERITY LEVEL VI VIOLATION
FAILURE TO DOCUMENT WELD INSPECTION RESULTS
VIOLATION 50-439/81-18-04

Description of Violation

10 CFR 50, Appendix B, Criterion XVII, as implemented by paragraph 17.1A.17 of the FSAR requires in part that sufficient records shall be maintained to furnish evidence of activities affecting quality. Inspection records shall identify the results, and the acceptability. TVA implementing procedures (Nuclear Components Manual, Section 4.2, paragraphs 2.2.2.C, 2.3.6, and 2.3.5 and Standard Operating Procedure MEU-SOP-602, paragraph 6.1.5) require that inspection results be recorded on appropriate inspection records and that the Operation Checklist be signed off as inspection operations are performed.

Contrary to the above, inspection records were not sufficient to furnish evidence of quality and did not identify results and acceptability in that:

1. On July 15, 1981, the final passes were being welded on weld 2VE01689 and the "Fitup" hold point had not been signed off on the Operations Checklist.
2. The "Fitup and Cleanliness" inspection report dated 8/31/79 for weld 2KE04099, which had been reviewed and was in the records vault, did not indicate whether the inspection was acceptable or rejectable.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

In both instances cited, the violation is a result of human error rather than any procedural or QA program deficiency.

The QC inspector involved with weld 2VE-01689 failed to initial and date the fitup inspection hold point on the applicable operation card (process control document) for the date that the inspection was performed and accepted, i.e., July 13, 1981.

The QC inspector involved with weld 2KE-04099 failed to circle the "Line Cleanliness" entry as accepted ("ACC") on the fitup inspection record completed on August 31, 1979, for this weld.

Corrective Action Taken and Results Achieved

In the case of weld 2VE-01689, the appropriate fitup inspection record was retrieved while the Region II Inspector was onsite. This record, dated July 13, 1981, was proof that the inspection had been performed and accepted before the beginning of the welding operation. The fitup inspection hold point on the operation card for weld 2VE-01689 was then

completed by the responsible QC inspector to reflect the date of acceptance. Site nonconformance, QCIR 11,398, was then written primarily to emphasize to the welder and the QC inspector involved the importance of following procedure with respect to sign off of hold points before proceeding with work.

For weld 2KE-04099, the fitup inspection hold point on the operation card had been initialed and dated by the QC inspector on August 31, 1979, thus indicating performance and acceptance of inspection. Also, on the back of the fitup inspection record, the presence of the foreman's signature indicated that line cleanliness was checked and found acceptable. Furthermore, line entry B on the fitup inspection record was circled "ACC" signifying that the weld joint was inspected and found acceptable. Based upon this evidence, it is reasonable to assume that the line cleanliness check was performed and accepted, and the line entry A on the fitup inspection record was then circled "ACC" to indicate such. Site nonconformance, QCIR 11,442, was written to disposition the concern.

Steps Taken to Avoid Further Violations

All Bellefonte site engineering and QC employees are aware of the importance of complete and accurate inspection records. Further, the importance of following procedures when documenting weld inspection results was emphasized to the individuals involved by the issuance of QCIR 11.398. TVA believes that this is sufficient action to prevent further recurrence.

Date of Full Compliance

With regard to this violation, TVA was in compliance with the established requirement as of August 31, 1981.