

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

400 Chestnut Street Tower II

81 SEP 28 AIO: 20
September 24, 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 - RESPONSE TO VIOLATION 50-438/81-19-02 -
INADEQUATE RIGGING TECHNIQUES

This is in response to R. C. Lewis' letter dated August 25, 1981, report numbers 50-438/81-19, 439/81-19, 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
INADEQUATE RIGGING TECHNIQUES
VIOLATION 50-438/81-19-02

Description of Violation

10 CFR 50, Appendix B, Criterion XIII and Tennessee Valley Authority (TVA) Final Safety Analysis Report Section 17.1A.13, requires "Handling, Storage and Shipping measures shall be established to control handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration . . ." Paragraph 6.3 of TVA's Field Construction Procedure 3.4.2, revision 6, requires that equipment, snubbers, sway struts . . . shall not be used for hoist supports without prior engineering approval.

Contrary to the above on July 30, 1981, hanger ORF-MPHG-0307SH2RO had a 1-1/2-ton hoist connected to the upper rod engine of sway strut. The hoist was being used to support a 36-inch motor operator 1KE-VUAC-059B. This action was being accomplished without engineering approval.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

The subject violation occurred as a result of craft employees failing to comply with the requirements established in Bellefonte Field Construction Procedure BNP-FCP-3.4.2, Revision 6, "Protection of Electrical/Mechanical Equipment and Cables from Construction Activities."

Corrective Action Taken and Results Achieved

The craft employees involved with the subject violation were instructed to remove the unauthorized rigging. Quality Control Investigation Report (QCIR) 11701 was generated to document the occurrence and to invalidate the QA inspection of the affected hanger. Engineering approval was given to use the rear bracket and surface-mounted plate of the affected hanger to rig the motor operator back into place. The hanger will be reinspected for damage and pull test of anchors will be repeated.

Craft employees involved were verbally warned of the serious nature of unauthorized rigging violations and craft management in the millwright craft, which was the craft involved in this particular instance, were reinstructed to the requirements of BNP-FCP-3.4.2.

Note: The steamfitter craft involved in the removal of valve 1KE-VUAC-059B had obtained engineering approval to use another permanent hanger, in the same area, for rigging to remove the valve. Therefore, it appears the corrective action on previous violation 438/80-28-01, "Failure to Protect Mechanical Equipment by Using Improper Rigging Techniques," was successful. However, "applicable craft" retraining did not include the millwright craft.

Steps Taken to Avoid Further Violations

Based on the results of an investigation performed during corrective action for the subject violation, additional training of personnel involved in rigging operations is needed to ensure future compliance with BNP-FCP-3.4.2. Therefore, all craft foremen and dual rates (a craft foreman that also works with tools) will receive special training in accordance with BNP-QCP-10.30, "Craft Quality Assurance Training," in the requirements of BNP-FCP-3.4.2, with emphasis on the two violations pertaining to inadequate rigging techniques.

Date of Full Compliance

The specific violation was corrected upon notification by the NRC inspector.

Corrective action required by QCIR 11701 will be completed by October 9, 1981.

Training of all craft foremen and dual rates (a craft foreman that also works with tools) will be completed by October 30, 1981.