

TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37407
400 Chestnut Street Tower II

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November 23, 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 - RESPONSE TO VIOLATIONS
50-438,50-439/81-21-01 - HANGER RECORDS NOT REFLECTING DATE OF INSPECTION
AND 50-438,50-439/81-21-02 - IMPROPER STORAGE OF HANGER RECORDS

This is in response to R. C. Lewis' letter dated October 9, 1981, report numbers 50-438/81-21, 50-439/81-21, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. Because of several unresolved considerations relating to the subject violations, the response was delayed. This delay and request for extension was communicated to R. V. Crlenjak (NRC-OIE RII) by telephone on November 3, 1981 and in writing to you on November 9, 1981. Enclosed is our response to the citations.

If you have any questions concerning this matter, please get in touch with R. H. Shell at FTS 858-2688.

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
SEVERITY LEVEL VI VIOLATION
HANGER RECORDS NOT REFLECTING DATE OF INSPECTION
VIOLATION 50-438,50-439/81-21-01

Description of Violation

10 CFR 50, Appendix B, Criterion XVII, and Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section V, requires that 'sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: Operating logs and the results of review, inspections, tests, audits, monitoring of work performance, and materials analysis. The records shall also include closely related data such as qualifications of personnel procedures and equipment. Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted. Records shall be identifiable and retrievable. Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention, such as duration, location, and assigned responsibility.' ANSI N45.2, paragraph 18, states in part: 'Inspection and test records shall, as a minimum, identify the date of inspection or test, the inspector or data recorder, the type of observation . . .' TVA Quality Assurance Program Requirements Manual for Design Procurement and Construction commits Bellefonte to ANSI N45.2. Bellefonte Quality Control Procedure BLP-QCP-10.7 does not address the above-noted ANSI N45.2, paragraph 18, requirement.

Contrary to the above, between August 1-31, 1981, the resident inspector identified six examples where the seismic support inspections were performed on a date other than what was noted on permanent records.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

The subject violation was discovered as a result of the resident NRC Inspector's audit of hanger inspection records filed in the QCRU records storage vault. The subject records were submitted to the vault between 10-1-78 and 8-1-80. During that time period the hanger inspection records were processed as follows: The physical/configuration inspection of a hanger was accomplished and documented by a hanger inspection checklist. A parallel inspection of other documents that may have authorized or documented changes to that support was also accomplished to ensure that such paperwork was acceptable/closed out. Based on these two inspections being acceptable, the 'permanent' record of the inspection was then filled out, signed, and dated. However, in general, the completion of the records search, particularly those of welding, lagged the configuration inspection resulting in the permanent record date being later than the date of the configuration inspection. In November 1979, the procedure was

revised to impose two signatures on the permanent record, one by the inspector who performed the configuration inspection and the other by the individual performing the records search. Again, the acceptance dates were usually different and the record was not submitted as 'permanent' until both were complete.

Corrective Action Taken and Results Achieved

Since August 1, 1980, no additional permanent records were submitted to the vault because the associated QCP (BNP-QCP-6.17) was revised. From this time forward, all supports submitted for inspection are to be held from configuration inspection until a thorough search of applicable records showed all records to be complete. This change will reduce the time between the date of the finalization of the records (i.e., 'permanent' status) via the configuration inspection and the date the 'permanent' record is submitted to the vault.

Steps Taken to Avoid Further Violations

Procedure BNP-QCP-6.17, revision 2, is in effect to prevent recurrence.

Date of Full Compliance

TVA is now in full compliance.

ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
SEVERITY LEVEL VI VIOLATION
IMPROPER STORAGE OF HANGER RECORDS
VIOLATION 50-438,50-439/81-21-02

Description of Violation

10 CFR 50, Appendix B, Criterion V, and Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section 17.1A.5, requires that 'Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.' Bellefonte Quality Control Procedure BNP-QCP-10.7 describes the manner in which quality assurance records shall be controlled and stored. ANSI N45.2.9 defines in part, 'a document is considered a quality assurance record when the document has been completed.'

Contrary to the above, between August 1-31, 1981, the resident inspector identified 31 examples where hanger and restraint inspection quality assurance records were not being stored in accordance with BNP-QCP-10.7.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

The physical/configuration inspection of a hanger was accomplished and documented by a hanger inspection checklist. A parallel inspection of other documents that may have authorized or documented changes to that support was also accomplished to ensure that such paperwork was acceptable/closed out. Based on these two inspections being acceptable, the 'permanent' record of the inspection was then filled out, signed, and dated. Generally, the completion of the records search, particularly those of welding lagged the configuration inspection and as a result the date that the permanent record was submitted to the storage vault was somewhat later than the date of inspection of the physical configuration. The subject 31 examples had not been submitted for permanent storage because the records search had not been completed. During the interim (i.e., the time span between the physical inspection and the records search), the records were stored in the Hanger Engineering Unit (HEU).

Corrective Action Taken and Results Achieved

The applicable procedure BNP-QCP-6.17, 'Seismic Support Installation and Inspection' (which governs the submittal of permanent hanger records), has been revised. This revision, Revision 2, was implemented on November 20, 1981. This revision will ensure that all records will be submitted in a timely fashion to be stored in accordance with BNP-QCP-10.7, 'Quality Assurance Records.' At this time, all permanent records will be submitted to the QCRU vault for storage. All records written before November 20, 1981 that are not already in the vault will be placed there by January 31, 1982.

Steps Taken to Avoid Further Violations

Implementation of procedure BNP-QCP-6.17, revision 2, will prevent recurrence of this condition.

Date of Full Compliance

TVA will be in full compliance with established procedure by January 31, 1982.