

US NRC REGION II  
ATLANTA, GEORGIA  
TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower

FEB 16 10:39

February 10, 1982

U.S. Nuclear Regulatory Commission  
Region II  
Attn: Mr. James P. O'Reilly, Regional Administrator  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - REVISED RESPONSE TO VIOLATION  
50-438, 50-439/81-29-01 - INADEQUATE FIELD MODIFICATION OF LETDOWN COOLER  
SUPPORTS

This is in response to R. C. Lewis' letter dated December 8, 1981, report numbers 50-438/81-29, 50-439/81-29, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. As discussed with R. V. Crlenjak by telephone on February 1, 1982, enclosed is our revised response to the citation.

The reason for the revision is that while implementing Work Release 27625, TVA noted inconsistencies in the information provided to TVA by B&W in field change package (FCP) 111. These inconsistencies precluded the completion of the work necessary to correctly modify the letdown cooler supports which TVA previously indicated would be completed by February 1, 1982. TVA has contacted B&W regarding the inconsistencies in FCP 111 and is awaiting a response from B&W.

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. Richard C. DeYoung, 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  
REVISED RESPONSE TO SEVERITY LEVEL VI VIOLATION 50-438, 50-439/81-29-01  
INADEQUATE FIELD MODIFICATION OF LETDOWN COOLER SUPPORTS

Description of Violation

10 CFR 50, Appendix B, Criterion V and Tennessee Valley Authority (TVA) Final Safety Analysis Report, Section 17.1A.5, states in part: "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." TVA final report to Region II, dated March 27, 1980 (NCR NEB 804), states in part: "B&W is to supply a field change package for modification of the support and support bracket by April 21, 1980. TVA expects to complete this corrective action, as specified by the field change package, by September 30, 1980."

Contrary to the above, between September 28 - October 2, 1981, the resident inspector checked to ensure the above noted field change was complete. This field change had been accomplished and QC inspected; however, the work was not performed as specified on the field change supplied by B&W, in that certain makeup and purification letdown cooler support bolts were not tightened to the degree specified. This could have resulted in damage to the cooler due to insufficient freedom of movement during thermal expansion of the component.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

Work Release Number 9488 was initiated to perform the modification as specified by B&W field change package (FCP) No. 111. This modification was performed on unit 1 and unit 2 supports, but evidently the spare cooler support located in the warehouse was overlooked during final inspection and the work release was inadvertently closed. It should be noted that the tightening procedure, for the studs/nuts connecting the sliding joint, was followed. However, it appears that subject nuts on the unit 2 supports were retightened at a later date by persons unknown.

Corrective Action Taken and Results Achieved

QCIR 13408 and 13416 have been initiated to record the improper tightening of the nuts on the unit 2 supports and the omission of modifying the spare support. These documents will remain open until the discrepancies are corrected.

Steps Taken to Avoid Further Violations

It has been stressed to the personnel involved that extreme care must be taken to assure that all work has been completed and verified before closing the associated documentation.

Date of Full Compliance

Work Release 27625 has been initiated to complete B&W FCP 111 modifications on the spare cooler support. A sequence control chart is in preparation to readjust the nuts/studs on the unit 2 supports. TVA expects all work to be complete by June 1, 1982.