TENNESSEE VALLEY AUTHORITY CHATTANOOGA, TENNESSEE 3740 ANTA, GEORGIA

400 Chestnut Street Tower II

February 52 F988 12 A8:57

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 UNIT 1 - RESPONSE TO VIOLATION 50-438/81-31-14 -UNDERSIZE WELDS ON THE ERCW VALVE HANDLING BRIDGE CRANE RAILS

This is in response to R. C. Lewis' letter dated January 7, 1982, report numbers 50-438/81-31, 439/81-31, 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 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

Mr. Richard C. DeYoung, Director (Enclosure) Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission Washington, DC 20555

ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNIT 1 UNDERSIZE WELDS ON THE ERCW VALVE HANDLING BRIDGE CRANE RAILS SEVERITY LEVEL V VIOLATION 50-438/81-31-14

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 be accomplished in accordance with procedures and drawings. TVA's drawing 4DW0751-X2-02 R2 details the welding requirement for the ERCW valve handling bridge crane rails.

Contrary to the above, between November 1-30, 1981, the resident inspector identified several areas where the welding did not meet the requirements in section G2-G2 of TVA drawing 4DW0751-X2-02, Rev. 2, which requires a 3/16" skip fillet 3" at 6". Some of the welds were too short and the skips too long.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

The welds as applied did not meet the exact dimensions spelled out on TVA drawing 4DW0751-X2-02, Rev. 2, and subsequent inspection failed to recognize the anomaly.

Corrective Action Taken and Results Achieved

Evaluation of these welds with respect to the amount of weld deposited reveals that more than 50 percent of the length is welded. The condition was referred to TVA Division of Engineering Design (EN DES) for further evaluation via NCR 1720. EN DES in turn evaluated the welds against design requirements. It was determined that the design was overly conservative such that the ERCW valve handling bridge crane rail welds are sufficient for use as is.

In addition to the nonconforming skip welds described, other evidence of improper performance of weld inspections was discovered during the complete reinspection of the unit 1 bridge crane assembly. These welds will be reworked to bring them into compliance with the applicable drawings. This work is being tracked by Quality Control Investigation Report (QCIR) 16089.

Corrective Steps Taken to Avoid Further Violations

A sample of the ERCW valve handling bridge crane rail welds in unit 2 were reinspected, and all were found to be acceptable. TVA considers this to be an isolated occurrence, and therefore recurrence control is not applicable.

Date of Full Compliance

Disposition of welds as identified in QCIR 16089 will be completed and full compliance achieved by March 20, 1982.