

TENNESSEE VALLEY AUTHORITY REGION II
CHATTANOOGA, TENNESSEE 37401
ATLANTA, GEORGIA
400 Chestnut Street Tower II

February 24, 1982 All: 10

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 - RESPONSE TO VIOLATION
50-438,50-439/81-32-01 - FAILURE TO FOLLOW PROCEDURE FOR HANGER INSPECTIONS

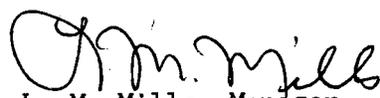
This is in response to R. C. Lewis' letter dated December 29, 1981, report numbers 50-438/81-32, 50-439/81-32, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. The response was delayed. This delay and request for extension was communicated to R. V. Crlenjak (NRC-OIE RII) by telephone on January 27, 1982 and in writing to you on January 29, 1982. 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

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
SEVERITY LEVEL V VIOLATION 50-438, 50-439/81-32-01
FAILURE TO FOLLOW PROCEDURE FOR HANGER INSPECTIONS

Description of Violation

10 CFR 50, Appendix B, Criterion V as implemented by Bellefonte FSAR section 17, paragraph 17.1A.5 requires in part that activities affecting quality be accomplished in accordance with instructions, procedures, or drawings. Bellefonte QCP-6.17, R2, states the procedure and acceptance criteria for inspection of seismic supports.

Contrary to the above, between December 9-11, 1981, activities affecting quality were not being accomplished in accordance with documented procedures in that a reinspection of 14 completed and inspected seismic supports revealed seven supports with deviations from the documented requirements.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for Violation

There are two reasons why the violation occurred. They are:

- a. Lack of attention to detail by QC inspectors because of the large number of inspection points on each hanger (about 30 points per hanger). This is apparently not specific to any inspector or group of inspectors.
- b. Unauthorized rework or damage occurring to the support(s) after inspection, possibly because of the ongoing construction activity in the area.

Corrective Action Taken and Results Achieved

The seven supports which deviated from documented requirements have been corrected as follows:

- a. 1KE-MPHG-0812 - The inspection record for this support was invalidated. The detail drawing was revised to R4 to provide a shim plate to correct the pipe to support gap. This support will be reworked.
- b. OWD-MPHG-0384, sheet 1 - The loose lock nuts were tightened per QCIR 14325. Support inspection has been accepted.
- c. ONM-MPHG-0553 - The detail drawing was revised to show the as-built configuration of the support installed within 9/16" of the edge of the embedded plate. Support inspection has been accepted.
- d. 2KE-MPHG-0929, sheet 1 - The eye nut (rod end) bent in excess of 1° has been documented and replaced by QCIR 15265. Support will be reinspected.

- e. 2KE-MPHG-0959 - Anchor spacing variance H-685 was initiated and approved to document the installation of more than two (2) unistrut bolts in one foot of unistrut. Support inspection has been accepted.
- f. 2NM-MPHG-1114 - The inspection record for this support was invalidated and work release 27897 initiated to rework the support to correct the gap(s) between the pipe lugs and the support structure. This support will be reworked.
- g. 2WD-MPHG-0119 - the original inspection of this support was found to be acceptable, based on the supplementary disposition of QCIR 15268 which stated that the support "is installed within 1/8" of the centerline of the noted embedded plate. Note I.9.a of 3GA0059-00-06, R4, is not a design criteria restraint but rather a tolerance or limitation on application of tolerance."

In addition to these seven deficient hangers, generic concerns on previously installed hangers will be addressed and corrected through actions of the IE 79-14 Bulletin Inspection Team.

Steps Taken to Avoid Further Violations

A memorandum has been issued to reiterate the criteria and requirements for supports and inspections to all QC inspectors.

The internal audit program established in April 1980 within the Hanger Engineering Unit (HEU) was intensified on January 6, 1982 by the creation of a special team of audit inspectors made up of personnel outside of the QC Inspection Unit to perform "next day" audit inspections. HEU now conducts audits of inspections, in a sample basis, of supports inspected the previous day. The special team supplements this effort and audits the regular audit team(s).

Date of Full Compliance

All rework on the deficiencies specified will be completed by March 28, 1982. The ongoing QC program of inspection(s) of supports as they are installed is supplemented by the following which should put TVA in full compliance at the time they are accomplished.

- a. When systems or components are transferred to the Division of Nuclear Power, the system/component will undergo a "walkdown" inspection per BNP-QCP-9.2 and
- b. TVA's inspection per the criteria initiated in the program to satisfy IE Bulletin 79-14.