

TENNESSEE VALLEY AUTHORITY  
CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

USNRC REGION II  
ATLANTA, GEORGIA  
March 11, 1982 A 9: 23  
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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  
50-438,50-439/81-33-08 - COLD SPRUNG PIPE

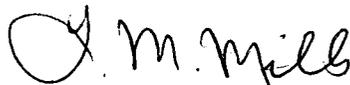
This is in response to F. S. Cantrell's letter dated January 26, 1982, report numbers 50-438/81-33, 50-439/81-33, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. The response to this violation was delayed from its original date of February 25 to March 12, 1982. The request for extension was communicated to R. V. Crlenjak (NRC-OIE RII) by telephone on February 25, 1982 and in writing on February 26, 1981. 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  
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  
COLD SPRUNG PIPE  
SEVERITY LEVEL VI VIOLATION 50-438,50-439/81-33-08

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."

Paragraph 7.5e of BNP-QCP-6.17 R2 states: "Rigid supports capturing the pipe shall be verified not to have the pipe cold sprung."

Contrary to the above, during February and March 1981, the resident inspector identified two areas in the Chemical Addition Boron Recovery System where piping sections had apparently been cold sprung due to installation of seismic supports. TVA completed their investigation of these areas in November and December 1981 and determined that the piping sections had in fact been cold sprung.

Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

Reason for the Violation

The violation occurred because of lack of specific inspection requirements in procedure BNP-QCP-6.7, to ensure the inspector was aware of and actually inspected for the condition (note: QCP-6.17, "Seismic Support Installation and Inspection," was issued to replace BNP-QCP-6.7 on April 13, 1981). It should be noted that the apparent root cause of the violation was that the craft personnel who installed the permanent pipe supports did not follow the appropriate procedures.

Corrective Action Taken and Results Achieved

The affected sections of piping were removed, replaced, and documented by QCIRs 7098 and 8014. Seismic pipe supports ONB-MPHG-0645F, -0646F, -0647F, -0649F, -0650F, and -0651F have been reinstalled, inspected, and accepted; ONB-MPHG-0648F has been reinstalled and is awaiting inspection; ONB-MPHG-0016F, -0017F, and -0632F have been disassembled (pipe capturing element removed) and will be reworked and inspected by April 15, 1982.

Steps Taken To Avoid Further Violations

BNP-QCP-6.17, "Seismic Support Installation and Inspection," provides more emphasis on each element of criteria and requires the inspector to "initial" each inspection element to ensure it was taken into account during the inspection. Paragraph 6.6.5.d requires that the inspector shall verify the pipe is not cold sprung; if the inspector even suspects a pipe is cold sprung, the hanger is rejected, and the responsible engineer is required to inspect and evaluate the individual hanger and adjacent hangers to determine the need and extent of possible rework. Paragraph 7.5.d provides the criteria for cold sprung inspection. Section Vd of Attachment A, "Support Inspection Checklist," requires that the inspector check for and initial that the pipe is not cold sprung.

TVA does not consider cold sprung pipe to be a generic concern at Bellefonte, and therefore no inspection of piping systems already in place is contemplated.

In addition, to emphasize the importance of preventing pipe cold springing, the Bellefonte Construction Superintendent issued a memorandum instructing all applicable craftsmen not to cold spring pipe during installation of pipe supports. Disciplinary action will be taken against craft employees when they are identified to be in violation of BNP-QCP-6.17.

Date of Full Compliance

Corrective action for this violation will be complete by April 15, 1982.