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SUBJECT: Interim deficiency rept re nonmetallic insulation used inside containment which violates FSAR commitment. Initially reported on 871229. Type, location & failure characteristics of insulation will be determined. Final rept by 880211.

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 TITLE: 50.55(e) Construction Deficiency Report

NOTES: G. Zech 3 cy. 1 cy. ea to: Ebnetter, Axelrad, S. Richardson, 05000438  
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TENNESSEE VALLEY AUTHORITY

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FEB 16 1988

BLRD-50-438/87-08  
BLRD-50-439/87-07

10 CFR 50.55(e)

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

BELLEFONTE NUCLEAR PLANT (BLN) UNITS 1 AND 2 - NONMETALLIC INSULATION USED  
INSIDE CONTAINMENT VIOLATES FSAR COMMITMENT - BLRD-50-438/87-08,  
BLRD-50-439/87-07 - INTERIM REPORT

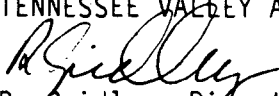
The subject deficiency was initially reported to NRC-Region II Inspector  
Joe Brady on December 29, 1987, in accordance with 10 CFR 50.55(e) as  
CAQR BLF870216. Enclosed is our interim report. We expect to submit our  
final report on or about one year before fuel load. We do not consider  
10 CFR 21 applicable to CAQR BLF870216.

A delay in submittal of this report to February 11, 1988, was discussed with  
NRC Region II Inspector Gordon Hunegs on February 1, 1988.

If there are any questions, please get in touch with P. C. Mann at  
(205) 574-8820.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
R. Gridley, Director  
Nuclear Licensing and  
Regulatory Affairs

Enclosures  
cc: See page 2

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PDR ADDCK 05000438  
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U.S. Nuclear Regulatory Commission

FEB 16 1988

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ENCLOSURE 1

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2  
NONMETALLIC INSULATION USED INSIDE CONTAINMENT  
VIOLATES FSAR COMMITMENT  
BLRD-50-438/87-08 AND BLRD-50-439/87-07  
CAQR NO. BLF870216  
10 CFR 50.55(e)  
INTERIM REPORT

Description of Deficiency

Section 6.2.2.2.2.8 of the Bellefonte FSAR states that all piping insulation inside containment is metallic reflective insulation constructed of austenitic stainless steel. Contrary to the FSAR requirement, Section 2.2.3 of Design Guide M18.9.1 specifies the use of foam glass insulation on refrigerant, cold water, and chilled water lines inside containment. Furthermore, TVA Drawings 3RW0641-00-1-R16 and 3RW0905-00-12-R7, show the supply and return 2-inch chilled water line that goes in the instrument room (inside containment) as being insulated with foam glass, and TVA Drawing 3RW0905-00-01-R7, note 19, specifies the use of 3-inch foam glass insulation for all air supply and return ducts. The cause of this condition is a lack of appropriate documentation in design criteria of requirements for placing insulation inside containment.

Interim Progress

The type, location, and failure characteristics of all insulation inside containment will be determined. Based on these findings necessary hardware modifications will be determined.

To prevent recurrence, insulation requirements inside containment will be established in the appropriate design criteria document.

ENCLOSURE 2

LIST OF COMMITMENTS  
FOR BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2

1. Type, location, and failure characteristics of all insulation inside containment will be evaluated.
2. Insulation requirements inside containment will be established in the appropriate design criteria document.
3. Final report to NRC will be provided.