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SUBJECT: Withdraws commitment to perform peer reviews of
10CFR50.55(e) items & violations that contain significant
corrective actions. Plan to reactivate plant const underway.
Reviews implemented in Project Manual BLEP-14.

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TITLE: 50.55(e) Construction Deficiency Report

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Tennessee Valley Authority, Post Office Box 2000, Hollywood, Alabama 35752

John H. Garrity
Site Vice President
Bellefonte Nuclear Plant

AUG 27 1992

**U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555**

Gentlemen:

In the Matter of the Application of)
Tennessee Valley Authority)

Docket No. 50-438
Docket No. 50-439

**BELLEFONTE NUCLEAR PLANT (BLN) - WITHDRAWAL OF COMMITMENT TO
PERFORM PEER REVIEWS**

In early 1986, a review of BLN nonconformance reports and significant condition reports determined that approximately 50 percent of the reports thought to be complete and ready for NRC closure were, in fact, not complete. This condition was evaluated and determined to be reportable in accordance with 10 CFR 50.55(e). The BLN First Interim Report (BLRD-50-438/86-06 and BLRD-50-439/86-05) (Enclosure 1) was submitted on April 3, 1986. In this report, BLN committed as follows: "The Bellefonte Site Director has issued a requirement for peer review of all significant 50.55(e) items and violations that contain significant corrective actions. This will be implemented in the Bellefonte Project Manual by June 30, 1986, and will ensure that final configurations and documentation meet commitments made in those responses and will emphasize consideration of aspects of a deficiency outside of those identified on the NCR or SCR being dispositioned."

The final report submitted by BLN for this reportable item was a Revised Final Report dated April 30, 1987 (Enclosure 2). In this report, BLN stated "The Bellefonte Site Director has issued a requirement for peer review of 50.55(e) items, violations responses, and other responses to NRC that contain significant corrective actions. This procedure has been implemented in the Bellefonte Project Manual as BLEP-14. It will ensure that final configurations and documentation meet commitments made in those responses and will emphasize consideration of aspects of a deficiency outside of those identified on the item being dispositioned. This increased attention to corrective actions will result in better and more complete reviews and actions on the part of individuals

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involved due to increased knowledge of requirements and awareness that their work is being thoroughly reviewed after-the-fact for acceptability."

On July 29, 1988, TVA notified the Commission that the construction of BLN Units 1 and 2 was being deferred. As a result, many procedures which were not applicable to the maintenance of the layup condition of the plant or those procedures which contained programs and requirements no longer being utilized at BLN were canceled. The Independent (Peer) Review Project Procedure, BLEP-14, was one such document.

TVA is presently evaluating and preparing a plan to reactivate construction of BLN. This reactivation evaluation includes a review of all outstanding work items and commitments to evaluate the impact of and the resources necessary to complete the item or meet the commitment. The commitment described above was made before development and implementation of the existing TVA corrective action program. The existing program contains requirements for the verification of work completion and review for generic applicability of the condition to other TVA plants.

The current BLN corrective action program is defined by BLN Site Standard Practice SSP-3.4, Corrective Action Program. The procedure describes the processes, requirements, and responsibilities for documenting and resolving deficiencies identified on Significant Corrective Action Reports. This corrective action procedure ensures that nonconformances receive proper evaluation and appropriate corrective action is taken. The procedure includes a requirement for a generic review of the nonconformance for applicability to other TVA plants and verification that corrective actions are complete. The remaining open issues, including those identified prior to the 1988 deferral, which would have been required to be reviewed in accordance with the BLEP-14 peer review program have been transferred to the new corrective action program and will be reviewed and processed in accordance with SSP-3.4, Corrective Action Program.

Correspondence to the NRC from BLN is currently controlled by Site Standard Practice SSP-4.50, Managing TVA's Interface with the NRC. This procedure implements the TVA Corporate Practice of similar title. The procedure states that: "Information provided to NRC which would have had a natural tendency or capability to influence an agency decision-maker must be complete and accurate." The procedure also requires a random review of selected correspondence or documents by someone other than the individual or group who originally prepared or reviewed the input.

The TVA implementation of the above discussed standard practices for the corrective action program and TVA's interface with the NRC, provides the assurance that issues receive appropriate reviews and the information sent to the NRC is complete and accurate. These processes are adequate to prevent recurrence of the failures which resulted in the BLN commitment to perform peer reviews in accordance with BLEP-14.

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Therefore, TVA has determined that the BLN commitment to perform peer reviews in accordance with BLEP-14 is no longer necessary and is withdrawing the commitment.

If you have any questions, please call Bruce Schofield, BLN Site Licensing Manager, at (205) 574-8058.



J. H. Garrity

Enclosures

cc: NRC Resident Inspector
Bellefonte Nuclear Plant
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Mr. B. A. Wilson, Chief, Project Chief
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U.S. Nuclear Regulatory Commission
Page 4

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GBK:BSS:KWC

Enclosures

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M. H. Philips, Jr., Washington, D.C.
R. H. Shell, LP 5B-C
RIMS, MR 2F-C (w/enclosures)

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ENCLOSURE 1

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5N 157B Lookout Place

April 3, 1986

BLRD-50-438/86-06
BLRD-50-439/86-05

U.S. Nuclear Regulatory Commission
Region II
Attention: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dear Dr. Grace:

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2 - FAILURE TO ADEQUATELY DISPOSITION
REPORTABLE NONCONFORMANCES IN THE DIVISIONS OF NUCLEAR ENGINEERING AND NUCLEAR
CONSTRUCTION - BLRD-50-438/86-06, BLRD-50-439/86-05 - FIRST INTERIM REPORT

The subject deficiency was initially reported to NRC-OIE Inspector
Art Johnson on February 24 and February 28, 1986 in accordance with 10 CFR
50.55(e) as SCRs BLN 4703 and BLN CEB 8604, 8605, 8606 respectively.

Enclosed is our first interim report. We expect to submit our final report no
later than one year before fuel loading of unit 1.

A delay of a few days in the submittal of this report was discussed with
NRC-OIE Inspector Art Johnson on March 27, 1986.

If there are any questions, please get in touch with R. H. Shell at
FTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. L. Gridley
Manager of Licensing

Enclosure

cc: Mr. James Taylor, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Records Center (Enclosure)
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

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U.S. Nuclear Regulatory Commission

April 3, 1986

AMK
for *AMK*
RHS:AMK:VYA

cc (Enclosure):

RIMS, MR 4N 72A-C

J. P. Darling, ONP, BLN

R. B. Kelly, LP 4N 45A-C (2)

George McNutt, 9-166 SB-K

Project Manager's Office, 9-169 SB-K

H. S. Sanger, Jr., E11 B33 C-K

F. A. Szczepanski, BR 1N 76B-C

Resident Inspector, Bellefonte-NRC

K. W. Whitt, E3 A8 C-K

COORDINATED: PMO/Ritts

bc: RESS

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
FAILURE TO ADEQUATELY DISPOSITION REPORTABLE NONCONFORMANCES
IN THE DIVISIONS OF NUCLEAR ENGINEERING AND NUCLEAR CONSTRUCTION
BLRD-50-438/86-06 AND BLRD-50-439/86-05
10 CFR 50.55(e)
SCR BLN 4703 AND SCR BLN CEB 8604
FIRST INTERIM REPORT

Description of Deficiency

In performing independent ("peer") reviews on 10 CFR 50.55(e) reportable nonconformance reports/significant condition reports (NCRs/SCRs), which were believed to be completed and ready for NRC closure, approximately 50 percent of the items were found to be incomplete for a variety of reasons, including inadequate or incomplete corrective actions (both in TVA's Division of Nuclear Engineering and Division of Nuclear Construction); incomplete, inadequate, or nonexistent review for generic implications; and inadequate action required to prevent recurrence. Based on these results, it is believed that a similar condition may exist for all TVA plants and may also apply to responses to violations or other responses made to NRC that contain significant commitments to NRC for TVA actions or design changes.

Examples of this are found in Bellefonte Nuclear Plant (BLN) SCR BLN 4703 and SCR BLN CEB 8604, 8605, and 8606, which were evaluated as reportable under 10 CFR 50.55(e), and SCR BLN CEB 8607, 8608, and 8609, which were nonreportable. This type of problem was also exhibited to some degree in the violation received by TVA on Watts Bar Nuclear Plant concerning Control Room Design Review discrepancies, which was one of the factors resulting in the performance of the peer review for BLN items.

Safety Implications

Failure to fully complete corrective actions, action required to prevent recurrence, or failure to perform adequate review for generic implications may result in an unsafe condition remaining uncorrected. As a result, the safe operation of the plant might be jeopardized.

Interim Progress

The Bellefonte Site Director has issued a requirement for peer review of all significant 50.55(e) items and violations that contain significant corrective actions. This will be implemented in the Bellefonte Project Manual by June 30, 1986, and will ensure that final configurations and documentation meet commitments made in those responses and will emphasize consideration of aspects of a deficiency outside of those identified on the NCR or SCR being dispositioned.

TVA is in the process of issuing a generic SCR (SCR GEN NEB 8603) describing this condition as potentially applicable to all TVA plants. The need for further corrective actions, and actions to prevent recurrence for BLN and other TVA plants, will be evaluated in disposition of the generic SCR.

The final report on this matter will be provided upon completion but no later than one year before fuel loading of unit 1.

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ENCLOSURE 2

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SN 157B Lookout Place

APR 30 1987

BLRD-50-438/86-06
BLRD-50-439/86-05

10 CFR 50.55(e)

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

Gentlemen:

BELLEVILLE NUCLEAR PLANT UNITS 1 AND 2 - FAILURE TO ADEQUATELY DISPOSITION
REPORTABLE NONCONFORMANCES IN THE DIVISIONS OF NUCLEAR ENGINEERING AND NUCLEAR
CONSTRUCTION - BLRD-50-438/86-06 AND BLRD-50-439/86-05 - REVISED FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector Art Johnson
on February 24 and February 28, 1986, in accordance with 10 CFR 50.55(e) as
SCRs BLN 4703 and BLN CEB 8604, 8605, and 8606, respectively. Our first
interim report was submitted on April 3, 1986. Related SCR GER NEB 8603 was
also determined to be reportable under 10 CFR 50.55(e). Our final report was
submitted on October 6, 1986. Enclosed is our revised final report. This
revision is to document reassignment of responsibility and status of the
corrective action. This revision was discussed with NRC Inspector Art Johnson
on March 30, 1987. We consider 10 CFR 21 to be applicable to SCR BLN CEB 8604.

If there are any questions, please get in touch with D. L. Terrill at
(205) 574-8820.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Original Signed By

J. A. Damer

R. L. Gridley, Director

Nuclear Safety and Licensing

Enclosure

cc: See page 2

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ENCLOSURE
BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2
FAILURE TO ADEQUATELY DISPOSITION REPORTABLE NONCONFORMANCES
IN THE DIVISIONS OF NUCLEAR ENGINEERING AND NUCLEAR CONSTRUCTION
BLRD-50-438/86-06 AND BLRD-50-439/86-05
10 CFR 50.55(a)
SCR GEN NEB 8603, SCR BLN 4703 AND SCR BLE CEB 8604, 8605, AND 8606
REVISED FINAL REPORT

Description of Deficiency

In performing independent ("peer") reviews of 10 CFR 50.55(e) reportable nonconformance reports/significant condition reports (NCRs/SCRs), which were believed to be completed and ready for MRC closure, approximately 50 percent (18 of 34) of the items were found to be incomplete for a variety of reasons, including inadequate implementation of corrective actions; incomplete, inadequate, or nonexistent review for generic implications; and inadequate specification of corrective action and action required to prevent recurrence. Major concerns (although all not safety related) were found for 12 of the incomplete items as listed in table 1.

The cause of this deficiency is believed to result from (1) failure of TVA engineers to take a broad scope view of problems and potential problem areas in problem identification, investigation, and resolution; (2) deficiencies in the method of control and tracking of generic implications reviews within TVA (i.e., failure of the system to ensure the reviews are completed and documented and to document reasoning when "no generic review is required"); and (3) isolated failures of TVA engineers to ensure completion of all activities required to complete an item and/or maintain acceptable configuration control over completed items.

This condition was evaluated for the Watts Bar Nuclear Plant (WBN) and it was determined that corrective action specific to WBN was not required. The reasoning behind this determination is given in the letter from R. L. Gridley to J. Nelson Grace dated June 27, 1986.

Specific corrective actions on the Browns Ferry and Sequoyah Nuclear Plants are not required as a result of this deficiency. These two plants now have major efforts underway to correct deficiencies wherein the final configuration does not match the design. Whether their problems were caused by inadequate implementation of corrective actions or other reasons, they will be adequately handled under their specific design baseline/configuration control programs. Corrective actions for other generic/programmatic concerns in areas such as corrective actions, generic reviews, training, etc., are given below.

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Safety Implications

Failure to fully complete corrective actions, identify proper corrective actions, and actions required to prevent recurrence, or perform adequate review for generic implications may result in a degraded or nonconservative condition remaining uncorrected. As a result, the safe operations of the plant might be jeopardized.

Corrective Action

TVA will ensure completion of the specific concerns and/or activities identified as incomplete in the Bellefonte peer review noted above. These items will be completed and reverified before being presented to the NRC Resident Inspector for closure.

The Bellefonte Site Director has issued a requirement for peer review of 50.55(a) items, violation responses, and other responses to NRC that contain significant corrective actions. This procedure has been implemented in the Bellefonte Project Manual as BLEP-14. It will ensure that final configurations and documentation meet commitments made in those responses and will emphasize consideration of aspects of a deficiency outside of those identified on the item being dispositioned. This increased attention to corrective actions will result in better and more complete reviews and actions on the part of the individuals involved due to increased knowledge of requirements and awareness that their work is being thoroughly reviewed after-the-fact for acceptability.

In addition, TVA has a number of efforts underway to improve the corrective action process and configuration control. These efforts are being led by the Division of Nuclear Quality Assurance (DNQA), the Division of Nuclear Services (DNS) and the DNR Engineering Assurance organization (EA). These activities will also serve to prevent recurrence of this problem. The following programmatic changes are underway by DNQA, DNS, and EA:

DNQA has developed a standardized corrective action program and its implementation should enhance the overall effectiveness of the handling of CAQs. The program upgrades the areas of generic reviews, interface controls, tracking, trending, and corrective action verification. In particular, the centralized generic reviews should ensure identified deviations receive a consistent and timely review for generic implications. The generic reviews are tracked and status reported to upper management. Additionally, the increased management attention in the corrective action process should raise the confidence level that required actions have been completely and effectively implemented.

DNS has a major effort underway to improve configuration control at all TVA nuclear plants. Some 21 areas of configuration control have been surveyed (with INPO involvement). Detailed actions are being developed into a TVA corporate plan on configuration management.

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To strengthen the corrective action program for CAQs in DNE, numerous changes and revisions have been implemented by EA within the DNE Procedures Manual. These changes, coupled with enhanced management awareness and attention, are intended to ensure the complete resolution of all steps involving CAQs within the corrective action process. Specifically:

1. Training - NEP-1.2 contains requirements for training of employees and management commensurate with levels of responsibilities and task assignment. DNE personnel have received instructions on NEP-9.1, Revision 0, "Corrective Action" and NQAM, Part I, Section 2.16, "Corrective Action," which forms the basis for NEP-9.1, revision 1. Additionally, the Engineering Assurance Training Section has developed a training course on the CAQ/corrective action program in NEP-9.1, revision 1, as part of its course offerings. This training will be provided to applicable DNE personnel by May 31, 1987.
2. Generic Implications - DNE CAQs processed beyond the immediate supervisor, under NEP-9.1, revision 1, will be reviewed by the responsible organization to determine if a generic review is required. Justification is required for a negative determination. If a generic review is required, the DNE CAQ is delivered to EA who determines which organizations, if any, should perform generic investigation(s). Although responsibility for conduct of generic investigations will remain with the assigned organization, CAQs will be given close scrutiny by EA and receipt of all responses to any generic evaluation will be a prerequisite to CAQ closure. Long-range planning by EA for the corrective action program includes the staffing of the Problem Report Section of the Problem Report and Trending Group. This section will be responsible for implementing and coordinating the DNE corrective action program by ensuring that all potentially generic CAQs are evaluated and investigated by affected organizations. This organization will ensure centralization and control of generic investigations within DNE and eliminate the concerns relative to the failure to conduct generic evaluations.
3. Corrective/Preventive Action - Existing practices and policies for the implementation of corrective and preventive actions, to include the determination and documentation of root causes, are considered adequate. NEP-9.1, revision 1, now requires completion of physical plant work as a condition for CAQ closure. Supplemented by the tracking of CAQs in the Tracking and Reporting of Open Items (TROI) system, more emphasis will be placed on those elements that ensure a closed loop system. Additionally, the Engineering Assurance internal auditing program will audit projects and branches for compliance with NEP-9.1, as appropriate.

All of the above procedural changes by DNQA and DNE have been implemented. Necessary training has been performed and additional training in DNE in the CAQ process will be given by May 31, 1987. Audits will be performed as deemed necessary and/or as required by procedures. TVA's corporate plan for configuration management will be developed by DNS by June 30, 1987. The above programmatic changes and their implementation will prevent recurrence of this condition.

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TABLE 1

MAJOR CONCERNS FROM BELLEFONTE PEER REVIEW

NCR/SCR NO.

MISSING ELEMENT

BLN 2318 &
2917

Clamp tightening procedures and generic review

BLN 2393

Corrective action changed, but report was not changed

BLN 2661

Generic review incomplete

BLN BLP 8121

Adequate design criteria revision and generic review

BLN BLP 8224

Corrective action inadequate

BLN NEB 8007

B&W to revise specifications

BLN QAN 8102

Documentation of required approval of ECN not complete

BLE CEB 79-07

Work not done although reported complete

BLN 1885

Future problems not considered

BLN 2383 &
2494

Corrective action not accomplished as committed. Some reinspection not done.

BLN BLP 8133

Error in final report and minor documentation mistake on commitment tracking record completion

BN-C-82-04
(Def. No. 2)

Program to show acceptability of miscellaneous steel not established as committed