

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
830 Power Building

MAY 3 1978

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 1217
230 Peachtree Street, NW.
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

This is in response to C. E. Murphy's letter dated April 10, 1978, RII:BRC 50-438/78-7, 50-439/78-7, concerning activities at the Bellefonte Nuclear Plant units 1 and 2 which appeared to have been in violation of NRC regulations. Response to the specific citation is as follows:

Deviation

50-438, 439-78-07-01 Housekeeping

Paragraph 17.1A.2.1.1 of the Final Safety Analysis Report states in part that, "This Quality Assurance Program satisfies...., and the following regulatory guidance: ... NRC Green Book". The NRC Green Book specifies Regulatory Guide 1.39 or ANSI Standard N45.2.3 for housekeeping requirements. Paragraph 3.2.1 of ANSI N45.2.3 states in part, "Garbage, trash, scrap, litter, and other excess materials shall be collected.... Such excess material shall not be allowed to accumulate and create conditions that will adversely affect quality". In addition, Paragraph 2.1 states in part, "The work and the quality assurance requirements for the housekeeping activities shall be delineated.... Necessary procedures and work instructions that are needed to assure compliance shall be identified and provisions shall be made for their preparation,"

Contrary to the above, on March 15-17, 1978, excess garbage, trash, scrap and other excess materials were observed in many working areas where safety-related pipe was being fit and welded on the 610 and 629 levels of the auxiliary building. In addition, the site did not have a procedure for the control of housekeeping.

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Corrective Action Taken and Results Achieved

On April 5, 1978, an inspection of the subject areas was conducted by Bellefonte Nuclear Plant management personnel using a preliminary copy of BNP-QCP 10.27, "Housekeeping" which was subsequently approved and issued with no changes on April 7, 1978. This procedure reemphasized implementation of good housekeeping practices and included the requirement for biweekly inspections.

Cleanup of subject areas, as well as other plant areas, is now taking place and formalized inspection, reporting, and followup procedures are available to ensure compliance.

Steps Taken to Avoid Further Recurrence

Housekeeping requirements are being reemphasized to construction personnel and biweekly inspections by Bellefonte Nuclear Plant management personnel will identify areas requiring corrective action.

Date of Full Compliance

Bellefonte Nuclear Plant will be in full compliance with the established requirements by April 28, 1978.

We have reviewed IE Inspection Report 50-438/78-7, 50-439/78-7 and find that it contains no proprietary information.

Very truly yours,



J. E. Gilleland
Assistant Manager of Power

cc: Dr. Ernst Volgenau, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555