

# TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
830 Power Building

APR 6 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 March 14, 1978, RII:JJB 50-438/78-5, 50-439/78-5, 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:

## Infraction

### 50-438, 439-78-05-01 Failure to Follow Procedures

Criterion V of 10 CFR 50, Appendix B, as implemented by FSAR Chapter 17, Paragraph 17.1.5 "Instructions, Procedures and Drawings" states, in part, that activities affecting quality are prescribed by documented instructions in the form of drawings, specifications, and procedures. TVA General Specification for Welding, G-29, specifies that the maximum weave to be used while welding with stainless steel covered electrode is four times the core wire diameter.

Contrary to the above requirements Weld No. INM00137 in the spent fuel cooling system was welded using a weave of greater than ten times the core wire diameter.

## Assessment of Infraction

As the result of a thorough inspection by Welding Engineering Unit (WEU) inspectors, this infraction was determined to be an isolated incident. A nonconformance report (NCR-824) was written for disposition of this finding and was forwarded to the Division of Engineering Design for their evaluation and consideration. Disposition of NCR-824 was to "use-as-is" based on the piping operating conditions and the size and thickness of the weld.

## Corrective Action Taken and Results Achieved

Immediate corrective action taken included the placing of a temporary mandatory hold point on all completed welds for inspection by the WEU before grinding. Craft employees were provided detailed instructions and reference copies of pertinent sections of G-29. All concerned craftsmen are now fully aware of the requirements established in G-29 regarding allowable weave and are conscious of the necessity for following these requirements. Subsequent cap inspections performed by the WEU verify full compliance.

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Mr. James P. O'Reilly

Steps Taken to Avoid Further Recurrence

WEU inspectors are now more alert to potential violations of weave requirements and have stepped up nonscheduled surveillances. Craft employees have been and will continue to be instructed and reminded of the necessity for following procedures.

Date of Full Compliance

Bellefonte Nuclear Plant was in full compliance with the established requirements as of March 21, 1978.

We have reviewed IE Inspection Report 50-438/78-5, 50-439/78-5 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