

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

85 APR 26 All: 14 April 23, 1985

U.S. Nuclear Regulatory Commission  
Region II  
Attn: 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 - RESPONSE TO VIOLATIONS  
50-438/85-07-01, 50-439/85-07-01 - FAILURE TO PERFORM QC PERSONNEL EYE  
EXAMINATIONS ON A YEARLY BASIS

This is in response to D. M. Verrelli's letter dated March 28, 1985, report numbers 50-438/85-07, 50-439/85-07, concerning activities at the Bellefonte Nuclear Plant which appeared to have been in violation of NRC regulations. 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

*J. A. Domer*  
J. A. Domer  
Nuclear Engineer

Enclosure

cc (Enclosure):

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

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT UNITS 1 AND 2  
RESPONSE TO SEVERITY LEVEL V VIOLATION  
50-438/85-07-01, 50-439/85-07-01  
FAILURE TO PERFORM QC PERSONNEL EYE  
EXAMINATIONS ON A YEARLY BASIS

Description of Deficiency

10 CFR 50, Appendix B, Criterion II requires that the licensee establish a quality assurance program which takes into account the need for special skills both in activity performance and inspection. TVA Topical Report TVA-TR75-1, revision 8, "Quality Assurance Program Description for Design, Construction, and Operation of TVA Nuclear Power Plants," Table 17D-1 establishes the applicability of ANSI N45.2.6-1978, "Qualification of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power," to Bellefonte Nuclear Plant (BLN) quality activities. Paragraph 2.5 of ANSI N45.2.6 states, "The responsible organization shall identify any physical characteristics needed in the performance of each activity. Personnel requiring these characteristics shall have them verified by examination at intervals not to exceed one year." TVA Topical Report TVA-TR75-1 does not take exception to ANSI N45.2, paragraph 2.5.

Contrary to the above, TVA Division of Medical Services policies used in the construction program do not require a yearly eye examination for quality control personnel performing visual examinations required by quality control procedure (QCP) 2.4, "Protective Coating for Concrete and Carbon Steel Surfaces." QCP 2.4, paragraph 7.4.1, requires that personnel performing the required visual examination have their vision corrected to 20/20. The medical policies only require these quality control personnel to have eye examinations every three years.

TVA Response:

1. Admission or Denial of the Alleged Violation

TVA admits the violation occurred as stated.

2. Reason for Violation

Revision 4 of TVA quality assurance topical report (TVA-TR75-1A) contained the following exception to the requirement of ANSI N45.2.6-1978, as referenced in the violation:

"Medical eye examination for inspection testing and examination personnel (other than NDE personnel) are made in accordance with TVA medical examination policies rather than annually."

During preparation of revision 5 to the topical report, this exception was inadvertently deleted and TVA failed to identify the deletion. The cause of the deletion is undetermined.

3. Corrective Steps Taken and Results Achieved

Nonconformance report (NCR) QEU-84-03 has been initiated to document the discrepancy involved with the removal of the exception. The corrective action of the NCR is to revise the topical report to include the exception referenced in section 2 above.

4. Corrective Steps Taken to Avoid Further Noncompliance

TVA feels that incorporation of the "exception" into the topical report as referenced in section 3 is sufficient to avoid further noncompliance; therefore, no additional actions will be required to prevent recurrence.

5. Date When Full Compliance Will Be Achieved

TVA will provide the NRC with the new revision to the topical report by May 31, 1985. Full compliance will be achieved upon NRC review and concurrence of the revised topical report.