

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

JUN 6 AM: 29

June 4, 1980

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Enclosed is our response to your May 9, 1980, letter, RII:WPK 50-518/80-07, 50-519/80-07, 50-520/80-07, and 50-521/80-07, regarding activities at Hartsville Nuclear Plant which appeared to have been in violation of NRC regulations.

We have reviewed the subject inspection report and find no proprietary information in the report. If you have any questions regarding this matter, please call Jim Domer at FTS 857-2014.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

RESPONSE TO NRC-OIE LETTER
FROM JAMES P. O'REILLY TO H. G. PARRIS
DATED MAY 9, 1980

Reference: RII:WPK 50-518/80-07, 50-519/80-07, 50-520/80-07, and
50-521/80-07

This report responds to the Notice of Violation described in Appendix A of the OIE Inspection Report referenced above. This is the final response on the subject noncompliances.

Noncompliance Item - Infraction 520/80-07-03

- A. As required by Criterion V of Appendix B to 10CFR50, and as implemented by PSAR Section 17.1A.5, "Activities affecting quality shall be prescribed by documented instructions, procedures, . . . and shall be accomplished in accordance with those instructions, procedures, . . ." TVA Detail Welding Procedure SM-11-B9-Revision 2 requires a 200° F minimum preheat temperature.

Contrary to the above, on April 6, 1980, while welding was in progress on containment structural butt joint No. A2CS117, the base material preheat temperature was less than 200° F one-half inch from the weld preparation area for the deposition of the next weld pass.

This is an infraction and applies to License No. CPPR-152 only. A similar item was brought to your attention in our letter dated January 29, 1980.

Response

1. Corrective Steps Taken and Results Achieved

The craftsmen performing the welding were aware of the preheat requirement and indicated that before the next weld pass was made the proper preheat would be established and verified. Therefore, no corrective action will be taken on the cited weld joint since no evidence of welding without proper preheat was found.

2. Corrective Steps Taken to Avoid Further Noncompliance

All welders performing welding on safety-related items which require elevated preheat (greater than 70° F) will have on their person a temperature indicating device, such as a temperature indicating crayon, capable of indicating the appropriate minimum preheat temperature. They will also have adequate preheating equipment in the immediate vicinity of the weld. These requirements have been reiterated to construction personnel and will be incorporated as project policy to prevent further noncompliances of this type.

3. Date When Full Compliance Will be Achieved

TVA will be in full compliance in this area by June 15, 1980.

Noncompliance Item - Infraction 519/80-07-04

- B. As required by Criterion V of Appendix B to 10CFR50, and as implemented by PSAR Section 17.1A.5, "Activities affecting quality shall be prescribed by documented instructions, procedures, . . . and shall be accomplished in accordance with those instructions, procedures, . . ." TVA Procedure for Hartsville Nuclear Site SOP-34, R-1, "Weld Inspection Documentation," paragraph 6.2, requires the inspector at the time of weld joint fitup to verify that the tack welder had stamped the work with his symbol prefixed by the letter "T" and that the joint has been stamped with the correct weld number.

Contrary to the above, on April 17, 1980, the following examples were noted:

1. One welded butt joint in the essential service water (ESW) system where the tack welds had been completed was not marked with joint identification or welder symbol.
2. One completed butt welded joint in the ESW system did not have the letter "T" prefixing the welder symbol.

This is an infraction and applies to License No. CPPR-151 only. A similar item was brought to your attention in our letter dated March 17, 1980.

Response

1. Corrective Steps Taken and Results Achieved

The weld joints cited as examples 1 and 2 were brought into compliance with applicable marking requirements on or before April 18, 1980.

As stated in our response to you dated May 7, 1980, in Infraction 50-518/80-04-01, TVA is investigating all other accessible welds begun since the issue date of SOP-34 and correcting those found not in compliance. Also, as stated, TVA is revising SOP-17 and SOP-34 to correct inconsistencies which may have led to the additional examples of noncompliance.

2. Corrective Steps Taken to Avoid Further Noncompliance

Clarification of the requirements of SOP-17 and SOP-34 will prevent noncompliance through misinterpretation in the future. TVA has readvised the crafts and inspection personnel of the correct interpretation of the SOP's and is continuing to monitor this activity periodically to ensure compliance.

3. Date When Full Compliance Will Be Achieved

TVA will be in full compliance on all the above by June 15, 1980.

Noncompliance Item - Deficiency 518,520/80-07-01

- C. As required by Criterion V of Appendix B to 10CFR50, and as implemented by PSAR Section 17.1A.5, "Activities affecting quality shall be prescribed by documented instructions, procedures, . . . and shall be accomplished in accordance with those instructions, procedures, . . ." TVA Procedure for Hartsville Nuclear Site CEP-8.03, Revision 10, paragraph 3, requires Welding Material Requisition (WMR) forms to be completed and to include the welder's signature, foreman's signature, issue date, and return due time.

Contrary to the above, on April 16, 1980, approximately fifty WMR forms were noted to contain the following discrepancies:

1. Welder's printed name vice a signature.
2. Foreman's printed name vice signature.
3. Missing or incorrect issue date.
4. Missing return time.

This is a deficiency and applies to License Nos. CPPR-150 and CPPR-152 only.

Response

1. Corrective Steps Taken and Results Achieved

TVA has determined from discussions with the personnel involved that although the WMR forms were not being properly filled out the welding material was being used in the proper manner and, therefore, no detrimental affect to the QA program has occurred. Since the WMR forms are valid for a single shift only and no retention requirement exists for the forms, no additional steps were taken to upgrade the forms.

2. Corrective Steps Taken to Avoid Further Noncompliance

Issuing and construction personnel have been reminded of the requirements of CEP 8.03 regarding the use of WMR's. Random reviews of WMR's will be performed to reveal and correct any deficiencies. Discussions with appropriate personnel and/or retraining will be accomplished as necessary.

3. Date When Full Compliance Will be Achieved

TVA will be in full compliance in this area by June 15, 1980.